

Exhibit 8

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Unknown Parties, et al.,
Plaintiffs,

v.

Jeh Johnson, et al.,
Defendants

Case No. CV-15-00250-TUC-DCB

EXPERT REPORT OF MICHAEL BANDEMER

A. INTRODUCTION

1. I am a Managing Director with Berkeley Research Group, LLC, ("BRG") and the national practice leader for the firm's Discovery and Forensic Technology Services group which provides, among other things, consulting and expert services in the areas of computer forensics, electronic discovery, data analytics and other associated technology advisory services to corporations, law firms, and governments in the United States and abroad.

2. I have more than 20 years of experience in investigations, technology and forensic matters. I advise both corporate and law firm clients on information technology, digital forensics, and e-discovery issues. I have served as the lead expert/investigator in hundreds of matters and performed or supervised the forensic collection and analysis of electronically stored information (ESI) from corporate networks, databases, personal computers (Mac and PC), phones, tablets, external storage devices, internet, and other digital storage media.

3. I am licensed in the State of California as a Certified Public Accountant and am also a Certified Management Accountant and Certified in Financial Forensics. Additionally, I am a Certified Information Technology Professional and an EnCase Certified Computer Examiner.

4. Among other professional associations, I am a past President of the High Technology Crime Investigation Association's (HTCIA) San Diego Chapter and a past Board Member of the HTCIA international organization as well as a member of the Sedona Conference Working Group I. I have testified at trial in both federal and state court as well as evidentiary hearings on digital forensics, e-discovery and data issues and served as a court appointed third party neutral expert. A true and correct copy of my curriculum vitae and testimony log, which summarizes my professional and educational background, is attached hereto as Exhibit A. My professional time for analysis and testimony is not contingent on any outcome and is currently billed at \$500 per hour.

B. BACKGROUND

5. On June 8, 2015, Plaintiffs filed a Complaint for Declaratory and Injunctive Relief based on the alleged inhumane treatment of civil detainees at U.S. Border Patrol locations in and around Tucson, Arizona.

6. Numerous declarations were submitted and discovery occurred leading up to an evidentiary hearing beginning November 14, 2016. Following the hearing, the Court issued an order on the Preliminary Injunction requiring Defendants comply with the following:

- a. Clean bedding, which Defendants assert they are providing to all detainees, must include a mat and a Mylar blanket for all detainees being held longer than 12 hours.
- b. Personal hygiene needs of detainees held longer than 12 hours include the need to wash or clean themselves.
- c. Defendants shall implement the universal use of their Medical Screening Form at all stations and ensure that the form questions reflect the TEDS requirements for delivery of medical care to detainees.
- d. Defendants shall monitor for compliance the following: availability of working sinks and toilets and/or other materials sufficient to meet the personal hygiene needs of detainees on a per cell per station basis; cell temperatures; cell sanitation and cleanliness; delivery to detainees of bedding, including mats, personal hygiene items such as toilet paper, toothbrushes and toothpaste, feminine hygiene items, baby food, diapers, and meals.

7. Following the Order, Defendants filed a Motion for Clarification wherein the parties stipulated that:

- a. In stations lacking showers, body wipes or similar hygiene products could suffice as an interim measure, provided Defendants could provide more detail about how and when these wipes would be distributed and where this cleaning would occur.
- b. Plaintiffs also agreed that Defendants could use the freeform e3DM fields pending system upgrade, provided Defendants could guarantee that the entries are intelligible and consistent across the Tucson Sector.

8. The Court also clarified that the 12-hour confinement period begins when a detainee arrives at a border station versus when a detainee was arrested.

C. SCOPE

9. On or about April 6, 2017, I was retained by Morrison & Foerster LLP ("Counsel"), to review and conduct analysis of Defendants' e3 Detention Module ("e3DM") data exports and quantify specific actions relating to the custody and care of detainees held within the Tucson Sector of the U.S. Border Patrol ("Border Patrol"), a division of CBP.

10. As part of my retention, I was asked to review the previous analysis performed and reported in support of Plaintiffs' Motion for Preliminary Injunction dated August 17, 2016 and to determine compliance with the Court's order dated November 18, 2016. In performing my analysis, I have summarized my findings in total, by month for the pre and post order time periods.

D. MATERIALS REVIEWED

11. In performing this analysis, I and/or BRG staff under my direction have considered and relied upon the following:

- a. Order filed 11/18/16;
- b. Declaration of Joseph Gaston filed 8/17/16;
- c. Moving papers, Opposition, and Order relating to Defendant's Motion for Clarification filed 12/2/16;
- d. Deposition of Antonio Trindade and exhibits;
- e. Defendants' Response to Plaintiffs' Interrogatories Pursuant to Federal Rule of Civil Procedure 33, Set Two, and attached Declarations thereto;

- f. E3DM data exports (USBP Requested e3 Detention Module Fields for Apprehensions Booked into TCA Sector Facilities); Cell Detention Data exports (USBP e3 Detention Module Subject Location Cell and Detention Cell Tables for Apprehensions Booked into TCA Sector Facilities); and Amenity Reports for the period of January 1, 2015 through May 31, 2017.
- g. A full list of the documents I relied upon in preparing this report is attached hereto as Exhibit B.

E. SUBSTANTIVE ANALYSIS AND OPINIONS

Defined Terms and Basis for Calculations:

12. I have been provided with nine (9) excel spreadsheets that purport to be data exported from Defendant's logging system and detention module "e3DM" that collectively cover the period of January 1, 2015 through May 31, 2017 ("REPORTED TIME PERIOD") and my understanding is that this system is used to track and monitor times of apprehension, detainee "bookings" in and out of a facility, and custodial actions taken with regard to individuals/detainees/aliens ("alien") in Customs and Border Patrol custody. These Excel spreadsheets were imported into a SQL Server database, into one table ("e3DM data") for use in the analysis and reporting detailed herein. The relevant fields and their descriptions are as follows:

Column Name	Definition
ALIEN_FILE_NBR	Alien file Number
EVENT_NUMBER	Event Number
BIRTH_DT	Date of Birth
SBJLOC_ID	A numeric value identifying a subjects location
SUBJECT_ID	Unique ID for subject
Actions	E3dm actions
Station	Border Patrol Station
Action_DT	Date of action
D	Days
H	Hours
M	Minutes
Hrs_BP_Custody	Hours in Border Patrol Custody
DA_COMMENT_TXT	A text describing the detention action.

13. I have reviewed (7) excel spreadsheets that purport to be data exported from Defendant's EID (Enforcement Integrated Database) that collectively covers the REPORTED TIME PERIOD and my understanding is that this data represents USBP e3 Detention Module Detention Cell Tables for Apprehensions Booked into TCA Sector Facilities. These Excel spreadsheets were imported into a SQL

Server database, into one table ("Cell Detention data"). Although I have not been asked to do any analysis or reporting of this data, I am prepared to offer analysis and or reporting if requested by Plaintiffs or the Court.

14. I have also received thirteen (13) Amenity report data extracts that collectively cover the period of October 1, 2015 through May 31, 2017 – a function of the e3DM and is a report produced every 24 hours (*see Nov. 21, 2016 Deposition of Antonio Trindade ("Trindade Dep.") at 89:16-20*) by Defendants. The report is available to Supervisor (or higher) level to document the conditions for all cells in a station or substation. These conditions include water fountain functioning, toilet functioning, cleanliness, pest free, bottled/jug water availability, sink functioning, temperature between 66-80, and ventilation. These Excel spreadsheets were imported into a SQL Server database, into one table ("Amenity data") for use in the analysis and reporting detailed herein

15. In each of the above e3DM exports, EID exports, and Amenity Reports, I noticed that there were a number of rows that were exact duplicates of other rows. As such, these duplicate rows were removed.

16. In order to analyze the actions specified by the order, I reviewed each unique "Detainment Event" utilizing the "ALIEN_FILE_NBR" ("Alien File Number" as defined in USA000700-702) and "EVENT_NUMBER" information. "ALIEN_FILE_NBR" is the unique identifier for the alien and is important in that two aliens with the same name will each have their own unique ALIEN_FILE_NBR. An "event" corresponds to each group of individual(s) that are apprehended into Border Patrol custody, and can be comprised of one or more individuals in one or more places. For example, a group of 5 individuals could be apprehended and they all would be assigned one EVENT_NUMBER, but each individual would have been assigned a unique ALIEN_FILE_NBR. An individual alien could belong to many events. A unique "detainment event", therefore, would be the unique combination of the values in both the ALIEN_FILE_NBR and EVENT_NUMBER fields.

17. Upon review of the e3DM data, I observed a considerable number of records with blank or NULL ALIEN_FILE_NBR values. As such, it would be difficult to ascertain a unique detainment event using a combination of the ALIEN_FILE_NBR and EVENT_NUMBER fields for these records. Therefore, I reviewed the data for a second field titled "SUBJECT_ID" which corresponds to both the unique individual alien number/name (even when this value was blank) and their respective EVENT_NUMBER, or incident and determined that this field could be used as a unique detainment event. Using this field, BRG calculated 144,294 unique detainment events prevalent in the relevant period. The example below depicts how the SUBJECT_ID corresponds to each unique alien number/name and EVENT_NUMBER.

Example 1:

EVENT_NUMBER	ALIEN_FILE_NBR	SUBJECT_NAME	SUBJECT_ID
AJ01501000318	NULL	[REDACTED]	[REDACTED]
AJ01501000318	NULL	[REDACTED]	[REDACTED]
AJ01501000318	NULL	[REDACTED]	[REDACTED]
AJ01501000318	[REDACTED]	[REDACTED]	[REDACTED]
AJ01501000318	[REDACTED]	[REDACTED]	[REDACTED]
AJ01501000318	[REDACTED]	[REDACTED]	[REDACTED]
AJ01501000318	NULL	[REDACTED]	[REDACTED]
AJ01501000318	NULL	[REDACTED]	[REDACTED]
AJ01501000318	NULL	[REDACTED]	[REDACTED]

18. The Actions field from the e3DM data includes the following unique action codes¹:

Action Code	Action Description
BKIN	Book In
BKOUT	Permanently Book out of USBP Custody
CNMFM	Contact With Family Not Made
CONT	Contacted Family Unit/Group
HYGBD	Bodily Cleansing Product
HYGDN	Dental Hygiene Product
HYGDP	Diaper
HYGFM	Feminine Hygiene Product
HYGPD	Personal Hygiene Product Provided
LANG	Language Service Provided
MDSCR	Medical Screening Completed
MEDNO	Medical Treatment (Non-OBP)
MEDOB	Medical Treatment (OBP)
MLACC	Served meal(Accepted)
MLREF	Served meal(Refused)
NCNSL	Consulate Notification Attempted/Made
NFOJC	FOJC and ORR Notified
ORRPL	ORR Placement Received
OTH	Other
PLARG	Placement Arranged

¹ Hygiene related codes were added January 29, 2016.

PRCMP	Processing Complete
PRSRC	Personal Search Conducted
RSTUS	Restraints Used
RWFU	Rejoined With Family Unit
SBREC	Subject Received
SBTRN	Subject Transferred
SEPCL	Separated from Family
SHWRP	Shower Provided
SKMKJ	Snacks, Milk, Juice Provided
SLPCT	Sleeping Cot/Mat and Blanket Provided
TELUD	Telephone Used
TMPBK	Temporary Book out of USBP Custody
UACVD	UAC Video Shown
UADIS	UAC72 - Civil Disturbance
UAFIR	UAC72 - Facility Fire
UAMDE	UAC72 - Medical Emergency
UANAD	UAC72 - Natural Disaster
UAOTH	UAC72 - Other
WLFCH	Welfare Check

19. As previously identified by the Gaston Declaration, the action codes, by themselves, in most cases do not consistently, or with sufficient detail, describe the action taken as necessitated by the analysis required.

20. As such, and as explained in various declarations filed in this matter previously, a freeform text field labeled “DA_COMMENT_TXT” was used to provide further detail on the actions taken while the agency updated its system with more descriptive/itemized codes.

21. However, the comments identified in the freeform text field are not standard nomenclature and within the data have inconsistencies and grammatical/spelling variations. As of the date of this report, the new action codes identified above have been added but have not been used consistently throughout the period. Therefore, we have used a blended approach to quantify actions based on both action codes and associated comments contained within the corresponding freeform text field.

Quantification of Amenities Defined by the Court Order:

22. In order to determine compliance with the categories outlined in the Court order, I computed the following:

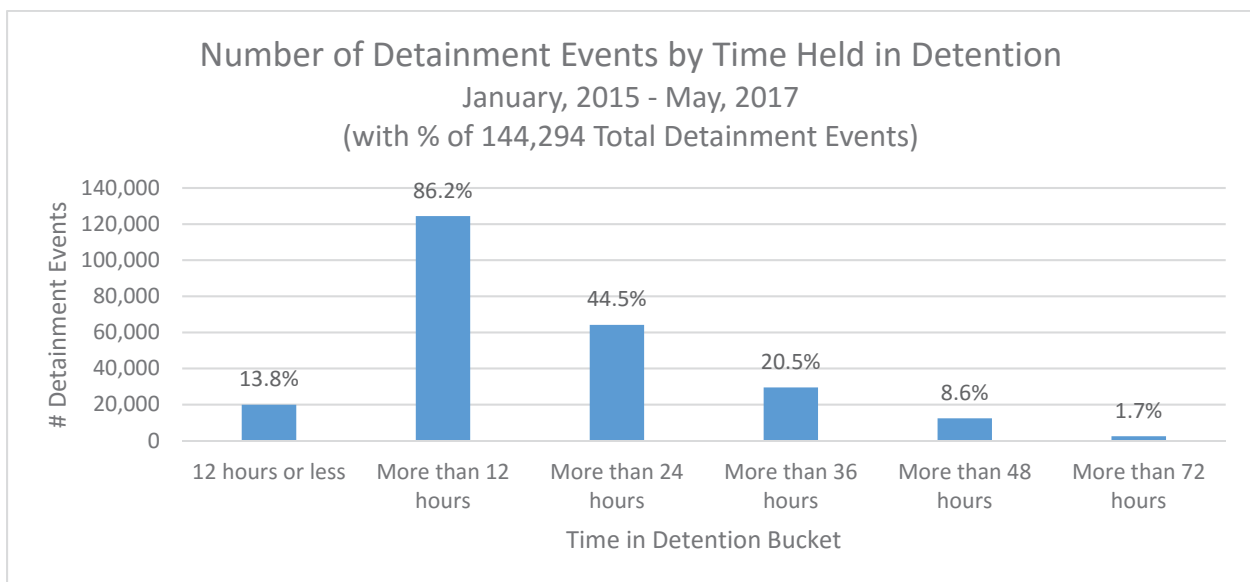
- a. Time in Custody in Excess of 12 Hours;

- b. Mat and a Mylar blanket for all detainees being held longer than 12 hours;
- c. Personal Hygiene for all detainees being held longer than 12 hours;
- d. Medical Screening Form; and
- e. Compliance Monitoring.

Time in Custody/Detention in Excess of 12 Hours

23. Chart 1 below represents the number of unique detainment events over the REPORTED TIME PERIOD that are specific to time in detention, bucketed by 12 hour increments of time in detention. The percentage indicates that the number of events relative to all unique detainment events over the REPORTED TIME PERIOD. An individual detainee may be apprehended multiple times, and therefore belong to multiple events. The chart below reflects the number of times each detainee is held and the hours associated with that individual's detainment.

Chart 1: Number of Detainment Events by Time Held in Detention



Time in Detention	# Detainment Events	% Detainment Events
12 hours or less	19,875	13.8%
More than 12 hours	124,419	86.2%
More than 24 hours	64,147	44.5%
More than 36 hours	29,528	20.5%
More than 48 hours	12,401	8.6%
More than 72 hours	2,490	1.7%

24. BRG calculated the total number of hours specific to a unique detainment event by taking all of the hours specific to that event, less the hours associated with "Arrest", and summing them. This value includes hours specific to time spent in custody ("In_BP_Custody"), or the time the individual enters a station or facility, until the individual is booked out of the facility. Time associated with "In_Transit" hours are included as well, as the individual although in transit from one station to another, is still defined as "In Custody" (see Nov. 21, 2016 Deposition of Antonio Trindade ("Trindade Dep.") at 95:13-23).

Mat and a Mylar blanket for all detainees being held longer than 12 hours

25. Per the order following the Preliminary Injunction, all detainees held longer than 12 hours are required to be provided BOTH a mat and (mylar) blanket. To calculate the number of unique detainment events greater than 12 hours where both a mat (or bed, pad or cot) and blanket was provided, I first filtered all unique detainment events where the total hours in BP custody were greater than 12 hours. I then searched the remaining records for instances of the action code "SLPCT", which is defined as "sleeping cot/mat and blanket provided". In addition, I searched the "DA_COMMENT_TEXT" column for terms related to "bed", "mat", "cot", "rug", "blanket", "pillow", "quilt", "spread", "foam", "pad", "padded", "mylar".

26. For all detainment events greater than 12 hours, over the REPORTED TIME PERIOD and applying the above-defined criteria, I calculated 16,285 (13.1%) detainment events wherein a detainee received both a mat (or bed, pad or cot) and blanket. The same calculation performed over the period January, 2015 through October, 2016 (defined as the "pre-order period") shows 2.1% of detainment events where a detainee received both a mat (or bed, pad or cot) and blanket. This percentage increases to 77.2% over the period November, 2016 through May, 2017 (defined as the "post-order period"). The results of my analysis and calculations are set forth at Exhibit 1.

Personal Hygiene for all detainees being held longer than 12 hours

27. Per the order following the Preliminary Injunction, all detainees held longer than 12 hours are required to be provided personal hygiene products. This category covers a broad range including detainees' ability to wash or clean themselves via a shower. In instances where a station lacks a shower, bodily cleansing products such as wipes or similar hygiene products are to be provided. Additional hygiene products include items related to personal hygiene (i.e., soap, deodorant, "shower in a bag"), and dental

hygiene products (i.e., toothbrush), feminine products (i.e., toilet paper, sanitary napkins), and baby supplies (i.e., diapers, baby food, formula).

28. To calculate the number of unique detainment events greater than 12 hours where a personal hygiene item was provided, I first filtered all unique detainment events where the total hours in BP custody were greater than 12 hours. I then searched the remaining records for instances of the action codes "SHWRP" (defined as "shower provided"), "HYGBD" (defined as "bodily cleansing product"), "HYGPD" (defined as "personal hygiene product"), "HYGDN" (defined as "dental hygiene product"), "HYGDP" (defined as "diaper"), and "HYGFM" (defined as feminine hygiene product"). In addition, I searched the "DA_COMMENT_TEXT" column for terms related to "shower", "shower bag/wipe/pad", "wash", "bath", "towel", "wipes", "body wipe/wash/product", "cleanse", "cleansing wipe/product/towel/materials", "towelette", "soap", "comb", "deodorant", "toilet paper", "feminine product/hygiene/pad", "maxi pad", "tampon", "female wipe/hygiene", "sanitary napkin", "baby wipe", "bottle", "diaper", "formula", "gerber", "nido", "powder milk", "milk (not powdered)", "baby food", "tooth/teeth brush", "dental", "oral rinse", and "mouth wash".

29. For all detainment events greater than 12 hours, over the REPORTED TIME PERIOD and applying the above-defined criteria, I calculated 31,326 (25.2%) detainment events wherein a detainee received personal hygiene products. The same calculation performed over the period January, 2015 through October, 2016 (defined as the "pre-order period") shows 18.9% of detainment events where a detainee received personal hygiene products. This percentage increases to 61.8% over the period November, 2016 through May, 2017 (defined as the "post-order period"). The results of my analysis and calculations are set forth at Exhibit 2.

Medical Screening Form Implementation

30. Per the order following the Preliminary Injunction, Defendants were required to implement universal use of their medical screening form at all stations. To calculate the number of unique detainment events where medical screening was provided, I searched the relevant data for instances of the action codes "MDSCR" (described as "medical screening completed"). In addition, I searched the "DA_COMMENT_TEXT" column for terms related to "doctor", "dr[.]", "emergency", "medic", "hospital", "ER", "medical AND (screen OR form OR care OR evaluation OR test OR need OR situation OR claim OR clearance OR observation OR attention OR reason OR concern OR center OR condition OR issue OR note OR question)", and "PREA".

31. For all detainment events over the REPORTED TIME PERIOD and applying the above-defined criteria, I calculated 4,347 (3.0%) detainment events wherein a detainee received medical screening. The same calculation performed over the period January, 2015 through October, 2016 (defined as the “pre-order period”) shows 2.8% of detainment events where a detainee received medical screening. This percentage increases to 4.3% over the period November, 2016 through May, 2017 (defined as the “post-order period”). When examining the detainment events since 2017, the percentage increases to 6.2% indicating a recent increase in attention to the recording of medical screening activity. The results of my analysis and calculations are set forth at Exhibit 3. The following table (1) represents the number of “Yes” and “No” values from the combined table of e3DM reports, specific to the post order requirements and calculations:

TABLE 1

YearMonth	Bedding		Hygiene		Medical Screening	
	Yes	No	Yes	No	Yes	No
201501	3	4,151	50	4,104	4	4,921
201502	2	5,054	79	4,977	5	5,639
201503	8	5,713	28	5,693	7	6,413
201504	-	5,023	79	4,944	11	5,740
201505	2	5,548	121	5,429	111	6,275
201506	15	4,567	81	4,501	173	5,145
201507	19	3,695	98	3,616	106	4,169
201508	28	4,254	287	3,995	184	4,758
201509	42	4,140	2,025	2,157	239	4,578
201510	65	5,524	3,184	2,405	375	5,786
201511	50	5,303	2,555	2,798	341	5,665
201512	49	5,803	1,009	4,843	302	6,215
201601	26	3,967	2,392	1,601	237	4,561
201602	93	4,568	1,808	2,853	224	5,223
201603	66	5,518	801	4,783	147	6,309
201604	83	5,328	965	4,446	191	5,846
201605	89	6,051	314	5,826	277	6,510
201606	137	4,829	1,706	3,260	87	5,541
201607	190	3,528	592	3,126	67	4,471
201608	288	3,347	194	3,441	115	4,397
201609	334	3,475	258	3,551	45	4,632
201610	595	4,588	1,413	3,770	145	5,846
201611	2,502	2,929	2,175	3,256	126	5,920
201612	3,308	442	2,453	1,297	109	4,293
201701	2,476	171	1,523	1,124	63	3,334
201702	1,688	335	1,421	602	123	2,477
201703	1,390	206	1,292	304	116	2,033
201704	1,066	37	923	180	105	1,373
201705	1,671	40	1,500	211	322	1,867
	16,285	108,134	31,326	93,093	4,357	139,937

Compliance Monitoring

32. Following the court order, Defendants implemented the tracking of certain monitoring for compliance of the following: availability of working sinks and toilets and/or other materials sufficient to meet the personal hygiene needs of detainees on a per cell per station basis; cell temperatures; cell sanitation and cleanliness; delivery to detainees of bedding, including mats, personal hygiene items such as toilet paper, toothbrushes and toothpaste, feminine hygiene items, baby food, diapers, and meals.

33. The amenity report is a function of the e3DM and is a report produced every 24 hours by Defendants. The report is available to Supervisor (or higher) level to document the conditions for all cells in a station or substation. These conditions include water fountain functioning, toilet functioning, clean(liness), pest free, bottled/jug water availability, sink functioning, temperature between 66-80, and ventilation. The user is provided with a "Yes" or "No" option for data input, as well as a field with mandatory comments for any "No" input. The following table (2) represents the number of "Yes" and "No" values from the combined table of amenity reports:

TABLE 2

YearMonth	# Sector Amenity Reports	# Records	# Compliance YES	# Compliance NO
201510	219	2,655	2,584	71
201511	743	9,193	8,931	262
201512	789	10,289	9,864	425
201601	781	10,281	10,022	259
201602	737	9,434	9,164	270
201603	776	9,898	9,660	238
201604	817	10,195	10,094	101
201605	925	11,117	11,050	67
201606	847	10,093	10,029	64
201607	872	10,524	10,483	41
201608	879	10,751	10,521	230
201609	835	12,923	12,837	86
201610	854	13,551	13,353	198
201611	842	11,868	11,787	81
201612	855	10,517	10,430	87
201701	893	11,074	10,775	299
201702	812	10,048	9,954	94
201703	872	10,877	10,724	153
201704	829	10,501	10,428	73
201705	826	10,703	10,610	93
	16,003	206,492	203,300	3,192

Additional Amenities Quantified Not Specifically Defined

34. In addition to the calculations summarized above, I computed the following calculations consistent with the prior analysis performed and computed these calculations over the broader REPORTED TIME PERIOD of January 1, 2015 through May 31, 2017:

- a. Provision of sleeping mats
- b. Provision of wipes or showers
- c. Provision of dental supplies
- d. Provision of feminine hygiene

- e. Provision of baby supplies
- f. Gap between meals
- g. Gap between burritos
- h. Provision of Medical Screening
- i. Provision of Medical Treatment
- j. Sleeping mats by facility
- k. Wipes or Showers by facility
- l. Provision/gap between meals by facility
- m. Number of detainees, by cell (cell detention data)

35. The results of my analysis and calculations of the above calculations are set forth in Exhibits 4 through 13j.

Provision of sleeping mats

36. To calculate the number of unique detainment events where a sleeping mat was provided, I searched the relevant data for instances of the action code "SLPCT", which is defined as "sleeping cot/mat and blanket provided". In addition, I searched the "DA_COMMENT_TEXT" column for terms related to "bed", "mat", "cot", "foam", "pad", and "padded".

37. For all detainment events over the REPORTED TIME PERIOD, applying the above-defined criteria, I calculated 19,680 (13.6%) detainment events wherein a detainee received a sleeping mat. The same calculation performed over the period January, 2015 through October, 2016 (defined as the "pre-order period") shows 2.1% of detainment events where a detainee received a sleeping mat. This percentage increases to 76.7% over the period November, 2016 through May, 2017 (defined as the "post-order period"). The results of my analysis and calculations are set forth at Exhibit 4.

Provision of wipes or showers

38. To calculate the number of unique detainment events where a wipe or shower was provided, I searched the relevant data for instances of the action code "SHWRP", which is defined as "Shower provided". In addition, I searched the "DA_COMMENT_TEXT" column for terms related to "shower", "shower bag/wipe/pad", "cleanse", "wash", "bath", and "towel".

39. For all detainment events over the REPORTED TIME PERIOD, applying the above-defined criteria, I calculated 12,358 (8.6%) detainment events wherein a detainee received a wipe or shower. The

same calculation performed over the period January, 2015 through October, 2016 (defined as the “pre-order period”) shows 1.9% of detainment events where a detainee received a wipe or shower. This percentage increases to 45.0% over the period November, 2016 through May, 2017 (defined as the “post-order period”). The results of my analysis and calculations are set forth at Exhibit 5.

Provision of dental supplies

40. To calculate the number of unique detainment events where dental supplies or dental hygiene product(s) were provided, I searched the relevant data for instances of the action code “HYGDN”, which is defined as “Dental Hygiene Product”. In addition, I searched the “DA_COMMENT_TEXT” column for terms related to “tooth/teeth brush”, “dental”, “oral rinse”, and “mouth wash”.

41. For all detainment events over the REPORTED TIME PERIOD, applying the above-defined criteria, I calculated 24,507 (17.0%) detainment events wherein a detainee received dental supplies. The same calculation performed over the period January, 2015 through October, 2016 (defined as the “pre-order period”) shows 15.5% of detainment events where a detainee received dental supplies. This percentage increases to 24.9% over the period November, 2016 through May, 2017 (defined as the “post-order period”). The results of my analysis and calculations are set forth at Exhibit 6.

Provision of feminine products

42. To calculate the number of unique detainment events where baby supplies were provided, I searched the relevant data for instances of the action code “HYGFM”, which is defined as “Feminine Hygiene Product”. In addition, I searched the “DA_COMMENT_TEXT” column for terms related to “toilet paper”, “feminine product/hygiene/pad”, “maxi pad”, “tampon”, “female wipe/hygiene”, and “sanitary napkin”.

43. For all detainment events over the REPORTED TIME PERIOD, applying the above-defined criteria, I calculated 1,073 (.7%) detainment events wherein a detainee received feminine products. The same calculation performed over the period January, 2015 through October, 2016 (defined as the “pre-order period”) shows 0.1% of detainment events where a detainee received feminine products. This percentage increases to 4.0% over the period November, 2016 through May, 2017 (defined as the “post-order period”). The results of my analysis and calculations are set forth at Exhibit 7.

Provision of baby supplies

44. To calculate the number of unique detainment events where baby supplies were provided, I searched the relevant data for instances of the action code "HYGDP", which is defined as "Diaper". In addition, I searched the "DA_COMMENT_TEXT" column for terms related to "baby wipe", "bottle", "diaper", "formula", "gerber", "nido", "powder milk", "milk (not powdered)", and "baby food".

45. For all detainment events over the REPORTED TIME PERIOD, applying the above-defined criteria, I calculated 1,845 (1.3%) detainment events wherein a detainee received baby supplies. The same calculation performed over the period January, 2015 through October, 2016 (defined as the "pre-order period") shows 0.8% of detainment events where a detainee received baby supplies. This percentage increases to 4.1% over the period November, 2016 through May, 2017 (defined as the "post-order period"). The results of my analysis and calculations are set forth at Exhibit 8.

Gap between meals

46. To calculate the average gap (in minutes) between meals (identified as any type of food offering whether it is a snack or something more substantial such as a hot meal), I searched the relevant data for instances of the action code "MLACC", which is defined as "Served Meal (Accepted)", as well as "MLREF", which is defined as "Served Meal (Refused)", and "SKMKJ", which is defined as "Snacks, Milk, Juice Provided". All 3 of these actions indicate that food was at least offered to the detainee. In addition, I searched the "DA_COMMENT_TEXT" column for terms related to "food", "meal", "breakfast", "lunch", "dinner", "ate", "eat/eating", "bean", "cheese", "milk", "drink/drinking", "water", "juice", "formula", "gerber", "nido", "electrolyte", "pedialyte", "snack", "soup", "burro/burrito", "crackers", and "fed/feeding".

47. My resultant dataset included detainment events containing at least one (1) food offering made. Detainment events with no food offerings were excluded from this analysis. The average gap between food offerings was calculated as the difference between the initial "In_BP_Custody" "Book_In" date and the first food offering as identified above, the difference between the initial food offering and any subsequent food offering, and the difference between the last food offering and the last "In_BP_Custody" "Book_Out" date. These minute calculations were averaged over the detainment event. Hours the detainee was "Booked_Out" of custody, and "In_Transit" were excluded. To my knowledge, Defendants have not produced any policies or procedures regarding the provision of meals during transit or between time of arrest and initial book in at a border patrol station (*see Aug. 17, 2016 Deposition of Joseph Gaston ("Gaston Dep.") at 10:16-20*).

48. My results indicate that there were 129,421 unique detainment events that had at least one (1) food offering. The overall average gap in minutes for these events was 213 (03:33 HH:MM). The same calculation performed over the period January, 2015 through October, 2016 (defined as the “pre-order period”) shows an average gap in minutes for these events to be 234 (03:54 HH:MM). This percentage decreases to 145 minutes (02:25 HH:MM) over the period November, 2016 through May, 2017 (defined as the “post-order period”). The results of my analysis and calculations are set forth at Exhibit 9.

Gap between burritos

49. To calculate the average gap (in minutes) between a burrito offered (a burrito is identified as being a food item considered more substantial than a snack, such as a hot meal), I searched the “DA_COMMENT_TEXT” column for terms related to “burro[s]” or “burrito[s]”.

50. My resulting dataset were detainment events containing at least one (1) burrito offering. Detainment events with no burrito offerings were excluded from this analysis. The average gap between burrito offerings was calculated as the difference between the initial “In_BP_Custody” “Book_In” date and the first food offering as identified above, the difference between the initial food offering and any subsequent food offering, and the difference between the last food offering and the last “In_BP_Custody” “Book_Out” date. These minute calculations were averaged over the detainment event. Hours the detainee was “Booked_Out” of custody, and “In_Transit” were excluded.

51. My results indicate that there were 125,563 unique detainment events that had at least one (1) burrito offering. The overall average gap in minutes for these events was 274 (04:34 HH:MM). The same calculation performed over the period January, 2015 through October, 2016 (defined as the “pre-order period”) shows an average gap in minutes for these events to be 296 (04:56 HH:MM). This percentage decreases to 206 minutes (03:26 HH:MM) over the period November, 2016 through May, 2017 (defined as the “post-order period”). The results of my analysis and calculations are set forth at Exhibit 10.

Provision of Medical Treatment

52. To calculate the number of unique detainment events where medical treatment was provided, I searched the relevant data for instances of the action codes “MEDNO” (described as “medical treatment (Non-OBP)”), and “MEDOB” (described as medical treatment (OBP)). In addition, I searched the “DA_COMMENT_TEXT” column for terms related to “dose”, “dosage”, “emt”, “headache”, “health”,

“healing”, “ibuprofen”, “injured”, “insulin”, “medication”, “medicine”, “meds”, “[0-9]mg”, “pain”, “pills”, “prescribed”, “prescription”, “treated”, “treatment”, “tab/tablet”, “complain/complaint/complaining”, “first aid”, “sore”, “cough”, “blister”, “hernia”, “blood”, “temperature taken”, “injuries”, “sent to medical”, “banner medical”, and “bandage”.

53. For all detainment events over the REPORTED TIME PERIOD, applying the above-defined criteria, I calculated 26,205 (18.2%) detainment events wherein a detainee received medical treatment. The same calculation performed over the period January, 2015 through October, 2016 (defined as the “pre-order period”) shows 14.5% of detainment events where a detainee received medical treatment. This percentage increases to 38.2% over the period November, 2016 through May, 2017 (defined as the “post-order period”). The results of my analysis and calculations are set forth at Exhibit 11.

Sleeping mats by facility, 1 report for each of 8 Tucson facilities

54. To calculate the number of unique detainment events, by facility, where a sleeping mat was provided, I first filtered the relevant dataset by known Tucson facilities:

- AJO_S-Ajo Station
- AJO_S_85C-Ajo Station 85 checkpoint
- NCO_S-Brain A. Terry Station
- CAG_S-Casa Grande Station
- DGL_S-Douglas Station
- DGL_S_SAT-Douglas Station Satellite Facility
- NGL_S- Nogales Station
- NGLS_S_19C-Nogales I-19 Checkpoint
- SON_S-Sonoita Station
- SON_S_83C-Sonoita Station Checkpoint on SR 83
- TCA_E_TCC- Tucson Sector Tucson Coordination Center
- TCA_E_NPC-Tucson Sector Nogales Processing Center
- TUS_S-Tucson Station
- WCX_S- Wilcox Station
- WCX_S_191C- Wilcox Station Checkpoint on SR 191

55. I then searched the resultant data for instances of the action code “SLPCT”, defined as “sleeping cot/mat and blanket provided”. In addition, I searched the “DA_COMMENT_TEXT” column for terms related to “bed”, “mat”, “cot”, “foam”, “pad”, and “padded”. If a unique detainment event contains one of the Tucson stations, and that station had a mat provided, then that station was counted once for that event. There could be multiple Tucson stations for one detainment event, as a detainee may be

transferred between stations. As such, if any of the stations had a mat provided, that station was counted once, for that detainment event.

56. The results of my analysis and calculations are set forth at Exhibits 12a – 12j.

Wipes or Showers by facility, 1 report for each of 8 Tucson facilities

57. To calculate the number of unique detainment events, by facility, where a shower was provided, I first filtered the relevant dataset by known Tucson facilities:

- AJO_S-Ajo Station
- AJO_S_85C-Ajo Station 85 checkpoint
- NCO_S-Brain A. Terry Station
- CAG_S-Casa Grande Station
- DGL_S-Douglas Station
- DGL_S_SAT-Douglas Station Satellite Facility
- NGL_S- Nogales Station
- NGLS_S_19C-Nogales I-19 Checkpoint
- SON_S-Sonoita Station
- SON_S_83C-Sonoita Station Checkpoint on SR 83
- TCA_E_TCC- Tucson Sector Tucson Coordination Center
- TCA_E_NPC-Tucson Sector Nogales Processing Center
- TUS_S-Tucson Station
- WCX_S- Wilcox Station
- WCX_S_191C- Wilcox Station Checkpoint on SR 191

58. I then searched the resultant data for instances of the action code “SHWRP”, which is defined as “Shower provided”. In addition, I searched the “DA_COMMENT_TEXT” column for terms related to “shower”, “shower bag/wipe/pad”, “cleanse”, “wash”, “bath”, and “towel”. If a unique detainment event contains one of the Tucson Sector stations, and that station had a wipe or shower provided, then that station was counted once for that event. There could be multiple Tucson stations for one detainment event, as a detainee may be transferred between stations. As such, if any of the stations had a wipe or shower provided, that station was counted once, for that detainment event.

59. I understand that only the Nogales and TCC stations have shower facilities, but I note that the e3DM data indicates that showers were provided at some of the other facilities (i.e., the “Actions” field is coded “SHWRP”, defined as “Shower Provided”). The results of my analysis and calculations are set forth at Exhibit 13a – 13j.

Provision of meals, by facility

60. To calculate the number of meals offered, by facility, where a meal was provided, I first filtered the relevant dataset by known Tucson facilities:

- AJO_S-Ajo Station
- AJO_S_85C-Ajo Station 85 checkpoint
- NCO_S-Brain A. Terry Station
- CAG_S-Casa Grande Station
- DGL_S-Douglas Station
- DGL_S_SAT-Douglas Station Satellite Facility
- NGL_S- Nogales Station
- NGLS_S_19C-Nogales I-19 Checkpoint
- SON_S-Sonoita Station
- SON_S_83C-Sonoita Station Checkpoint on SR 83
- TCA_E_TCC- Tucson Sector Tucson Coordination Center
- TCA_E_NPC-Tucson Sector Nogales Processing Center
- TUS_S-Tucson Station
- WCX_S- Wilcox Station
- WCX_S_191C- Wilcox Station Checkpoint on SR 191

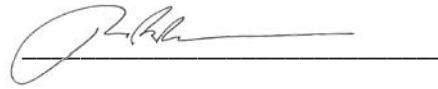
61. To calculate the number of meals offered, by facility, where a meal was provided, I first filtered the relevant dataset by known Tucson facilities. I then searched the relevant data for instances of the action code “MLACC”, which is defined as “Served Meal (Accepted)”, as well as “MLREF”, which is defined as “Served Meal (Refused)”, and “SKMKJ”, which is defined as “Snacks, Milk, Juice Provided”. All 3 of these actions indicate that food was at least offered to the detainee. In addition, I searched the “DA_COMMENT_TEXT” column for terms related to “food”, “meal”, “breakfast”, “lunch”, “dinner”, “ate”, “eat/eating”, “bean”, “cheese”, “milk”, “drink/drinking”, “water”, “juice”, “formula”, “gerber”, “nido”, “electrolyte”, “pedialyte”, “snack”, “soup”, “burro/burrito”, “crackers”, and “fed/feeding”. Table (3) below represents meals offered, accepted, and declined, by facility:

TABLE 3:

Facility	Meals Offered	Meals Accepted	Meals Declined	Meals Offered (neither Accepted Nor Declined)
Ajo Station	32,350	28,861	488	3,001
Brian A. Terry	17,810	13,094	762	3,954
Casa Grande Station	57,986	48,354	430	9,202
Douglas Station	49,865	47,694	596	1,575
Nogales Station	52,722	39,424	1,332	11,966
Sonoita Station	5,619	4,813	147	659
Tucson Sector Nogales Processing Center	1	1	-	-
Tucson Sector Tucson Coordination Center	601,879	542,094	3,248	56,537
Tucson Station	37	15	-	22
Wilcox Station	5,945	4,385	233	1,327

62. I am prepared to supplement the report if requested and as additional data becomes available. The view expressed in this report are those of the author and should not be construed as representing the positions of all experts at Berkeley Research Group.

Executed this 22nd day of September 2017 at San Diego, California.



MICHAEL R. BANDEMER

Exhibit A

CV and Testimony Log



Michael R. Bandemer

CPA, EnCE, CFF, CMA, CITP

Managing Director

P: 619.823.8867

mbandemer@thinkbrg.com

Summary

Michael Bandemer is a Managing Director with Berkeley Research Group and leader of its Discovery and Forensic Technology Practice which specializes in e-discovery, digital forensics and investigations. Prior to joining Berkeley Research Group, Mr. Bandemer was a Managing Director with Huron Legal, an international advisory and business services firm, and previously the national practice leader of LECG's Legal Technology and Analytics Consulting group (LTAC) which specialized in e-discovery, digital forensics and data analytics and provided strategic consulting, expert testimony and services to corporations and law firms across all phases of discovery.

Mr. Bandemer has performed or supervised the preservation, forensic collection and analysis of electronically stored information ("ESI") from corporate networks, databases, personal computers (Mac and PC), phones, tablets, external storage devices, social media, archives, cloud providers and other digital storage media in hundreds of matters ranging from internal and federal investigations to commercial disputes. Mr. Bandemer advises both corporate and law firm clients and provides expert testimony regarding various information management and legal technology issues including internal discovery processes, procedures, best practices, evidence preservation and collection, computer forensics, electronic discovery, complex data analytics, and other information technology issues.

Mr. Bandemer has qualified in court as an expert in e-discovery and computer forensics and provided testimony at deposition, arbitration and federal and state court. He has been selected as an independent e-discovery expert and has served as a 30(b)(6) corporate representative, special master and court appointed third-party neutral in various engagements. In these matters Mr. Bandemer has addressed discovery issues concerning records management, accessibility, burden, preservation, collection, spoliation, search and production.

The diverse range of matters Mr. Bandemer has assisted with includes misappropriation of trade secrets, internal investigations, breach of contract, business interruption, employment disputes, fraud investigations, securities, and wage and hour class actions among others. He has experience in a broad spectrum of industries including high technology, financial services, construction, professional services, gaming, hospitality, entertainment, oil and gas, government, retail, auto, railroad, entrepreneurial business, manufacturing, and real estate.

Professional Experience

Berkeley Research Group	Managing Director	2014 to Present
Huron Consulting Group	Managing Director	2011 to 2014
LECG (Mack Barclay Inc.)	Partner	1994 to 2011
Peterson Consulting, L.P.	Senior Consultant	1990 to 1994
Phelps Dodge Corporation	Associate	1988 to 1990



Education and Certifications

Bachelor of Science in Finance, Arizona State University 1990, *cum laude* graduate.
Member of the Golden Key Honor Society
Selected for *Who's Who Among Students in American Universities and Colleges*
Served as the chief budgeting assistant for the Associated Student Body (1989–1990)

Certified Public Accountant, 1998

Certified Management Accountant, 1995

Certified Information Technology Professional, 2001

Certified EnCase Computer Examiner, 2003

Certified Financial Forensics, 2008

Continuing education as lecturer and participant.

Patents Held

System and Method for Managing Observational Information Items
United States 7,107,278 B1, Issued September 12, 2006
Structural relational database and interface developed for managing electronic information, photos, and digitized field drawings/notes and other information in construction defect matters.

Professional Associations

American Institute of Certified Public Accountants
High Technology Crime Investigation Association
The Sedona Conference Working Group:
Electronic Document Retention and Production
California State Society of Certified Public Accountants
Association of Certified Fraud Examiners
Association of Records Managers & Administrators
Association for Information and Image Management
Institute of Management Accountants

Publications

Digital Forensics in Trade Secret Investigations
Trade Secret Litigation and Protection in California (Third Edition)
Section Co-contributor, State Bar of California, December 2014
The Changing ESI Landscape: How a Proactive eDiscovery Program can Control Litigation Costs
XPRT Forum Magazine, March 2010
The Rising Costs of Litigation
Fox Business Channel, March 2010



Anatomy of an IP Theft: A Case Study of a Forensic Computer Investigation

e-Discovery Law & Strategy, September 2007, Volume 4, Number 5

*You Want Me to do What? A Practical Look at the Question of Proper Preservation of Electronically
Stored Information in Today's Business Litigation Environment* with Sergio D Kopelev

Nevada Lawyer, October 2006

Computer Forensics, an Effective HR Tool

Employers Group People & Productivity Newsletter, April/May 2002, Volume 59

Board Experience

Past President and 1st Vice President - High Technology Crimes Investigation Association (HTCIA); San Diego Chapter
Youth Tennis San Diego—Board of Directors, Past President



Michael R. Bandemer, CPA, EnCE, CITP, CFF, CMA
Record of Live Testimony
Previous 10 Years

Date	Case Name	Venue	Testimony
08/10/17	State of Louisiana v. Louisiana Land and Exploration Company, et al.	Federal- LA	Evidentiary Hearing
04/26/17	Vintage Assets Inc. v. Tennessee Gas Pipeline Company LLC et al.	Federal- LA	Deposition
12/18/16	Catherine P. Alford et al. v. Chevron U.S.A. Inc. et al	Federal- LA	Deposition
12/09/16	Vintage Assets Inc. v. Tennessee Gas Pipeline Company LLC et al.	Federal- LA	Deposition
10/13/16	BCR Holdings, Inc. vs. Baby Oil, Inc., et al.	LA State Court	Deposition
06/02/16	Universal Card, Inc. v. Cassell et al	OC Superior	Deposition
05/17/16	Earl Powell Gray et al v. ACO USA, LLC	LA State Court	Deposition
05/18/16	Carroll Jane Arceneaux et al v. Boudreaux et al.	LA State Court	Deposition
01/13/16	D and D Cajun Ventures, LLC, et al. v. Atlantic Richfield Co., et al.	LA State Court	Deposition
01/07/16	In re: Transperfect Global, Inc, et al	DE State Court	Trial
01/06/16	In re: Transperfect Global, Inc, et al	DE State Court	Deposition
12/22/15	In re: Transperfect Global, Inc, et al	DE State Court	Deposition
10/28/15	Primeaux et al v. Exxon Mobile et al.	LA State Court	Deposition
10/07/15	Beckett Media, LLC v. Check Out My, LLC	WA State Court	Deposition
03/23/15	Fyfe Co., LLC et al. v. Structural Group, Inc. et al.	Federal - MD	Deposition
02/10/15	DuPont, et al. v. Mobile Oil E&P S.E., Inc. et al	LA State Court	Deposition
01/28/15	Rutherford v. Palo Verde Health Care District et al	Federal-CA	Deposition
01/27/15	Pat & Oscars Concepts v. Foley et al	SD Superior	Trial
12/09/14	Mohammed Mohideen v. Calnet, Inc.	Federal - CA	Deposition
11/18/14	State of Louisiana v. Louisiana Land and Exploration Company, et al.	LA State Court	Deposition
10/30/14	State of Louisiana v. Louisiana Land and Exploration Company, et al.	LA State Court	Trial
10/23/14	Tammy Garcia v. Mako Surgical Corp	Federal - FL	Deposition
10/16/14	Stephen Welsh v. Ryder Truck Rental, Inc., et al.	SD Superior	Deposition



Michael R. Bandemer, CPA, EnCE, CITP, CFF, CMA
Record of Live Testimony
Previous 10 Years

Date	Case Name	Venue	Testimony
07/25/14	Pat & Oscars Concepts v. Foley et al	SD Superior	Deposition
04/22/14	Perlan Therapeutics v Nexbio, et al	SD Superior	Deposition
01/28/14	Tillman, Randolph et al v. Chevron U.S.A. Inc., et al	LA State Court	Trial
10/09/12	Texaco Exploration and Production Inc. v. Hilcorp Energy et al.	LA State Court	Trial
09/14/12	Sterling Sugars Production Co. v. BP America Production Co., et al.	LA State Court	Deposition
09/06/12	Costco Wholesale Corporation v. WA Dept. of Revenue	WA Superior	Deposition
08/31/12	Saadat et al. v. Scot Cheatham, et al.	SD Superior	Arbitration
08/17/12	Texaco Exploration and Production Inc. v. Hilcorp Energy et al.	LA State Court	Deposition
08/06/12	Saadat et al. v. Scot Cheatham, et al.	SD Superior	Deposition
03/06/12	C.S. Gaidry Inc., et al v. Union Oil Company of California et al.	LA State Court	Deposition
07/12/11	Parsi v. First Communications, Inc.	SD Superior	Trial
04/26/11	Kenny v. North County Ford	SD Superior	Arbitration
02/20/11	Parsi v. First Communications, Inc.	SD Superior	Deposition
02/16/11	Mountain View Recreation v. Imperial Commercial Cooking	Las Vegas Superior	Deposition
07/14/10	MKR Properties v. Lee & Associates, et al.	SD Superior	Deposition
06/21/10	Technology Integration Group v. Dragoni	SF Superior	Trial
06/14/10	India Street Ventures v. Swinerton Builders	SD Superior	Deposition
04/14/10	Granados v. Cruizin' Cooler	OC Superior	Deposition
04/06/10	Allen v. Frontier Partners	Las Vegas Superior	Trial
03/30/10	Allen v. Frontier Partners	Las Vegas Superior	Deposition
03/09/10	Guillen v. Rick Concrete Construction, Inc.	Riverside Superior	Deposition
02/04/10	Marsch v. Lennar Corporation	SD Superior	Trial
12/04/09	Whatman Inc. v. Davin	Federal - NY	Deposition



Michael R. Bandemer, CPA, EnCE, CITP, CFF, CMA
Record of Live Testimony
Previous 10 Years

Date	Case Name	Venue	Testimony
10/06/09	TIG v. FusionStorm	SF Superior	Deposition
09/18/09	Individual Networks v. Apple Inc.	Federal - TX	Deposition
06/28/09	Marsch v. Lennar Corporation	SD Superior	Deposition
05/18/09	Marsch v. Lennar Corporation	SD Superior	Deposition
05/15/09	American National Investment v. Watt Companies	SD Superior	Deposition
12/19/08	4S Kelwood v. Geocon	SD Superior	Deposition
12/16/08	Landstar Investments 2, Inc. v. The Sagres Company	SD Superior	Trial
07/23/08	Landstar v. The Sagres Company	SD Superior	Deposition
05/28/08	Kenny v. North County Ford	SD Superior	Arbitration
03/10/08	Kenny v. North County Ford	SD Superior	Arbitration
11/27/07	Kenny v. North County Ford	SD Superior	Arbitration
11/09/07	Kenny v. North County Ford	SD Superior	Deposition
07/25/07	Express v. Taylor	SD Superior	Trial
07/10/07	Weisberg v. Richter	LA Superior	Arbitration
03/14/07	Eldorado Stone v. Renaissance Stone	Federal - CA	Trial
03/14/07	Eldorado Stone v. Renaissance Stone	Federal - CA	Deposition
02/21/07	Eldorado Stone v. Renaissance Stone	Federal - CA	Deposition
02/13/07	Mytee Products v. MC Viking	SD Superior	Deposition
01/22/07	Injen Technology v. Kim	LA Superior	Trial
01/10/07	Injen Technology v. Kim	LA Superior	Deposition

Exhibit B**List of Materials Relied Upon by Michael Bandemer and Berkeley Research Group**

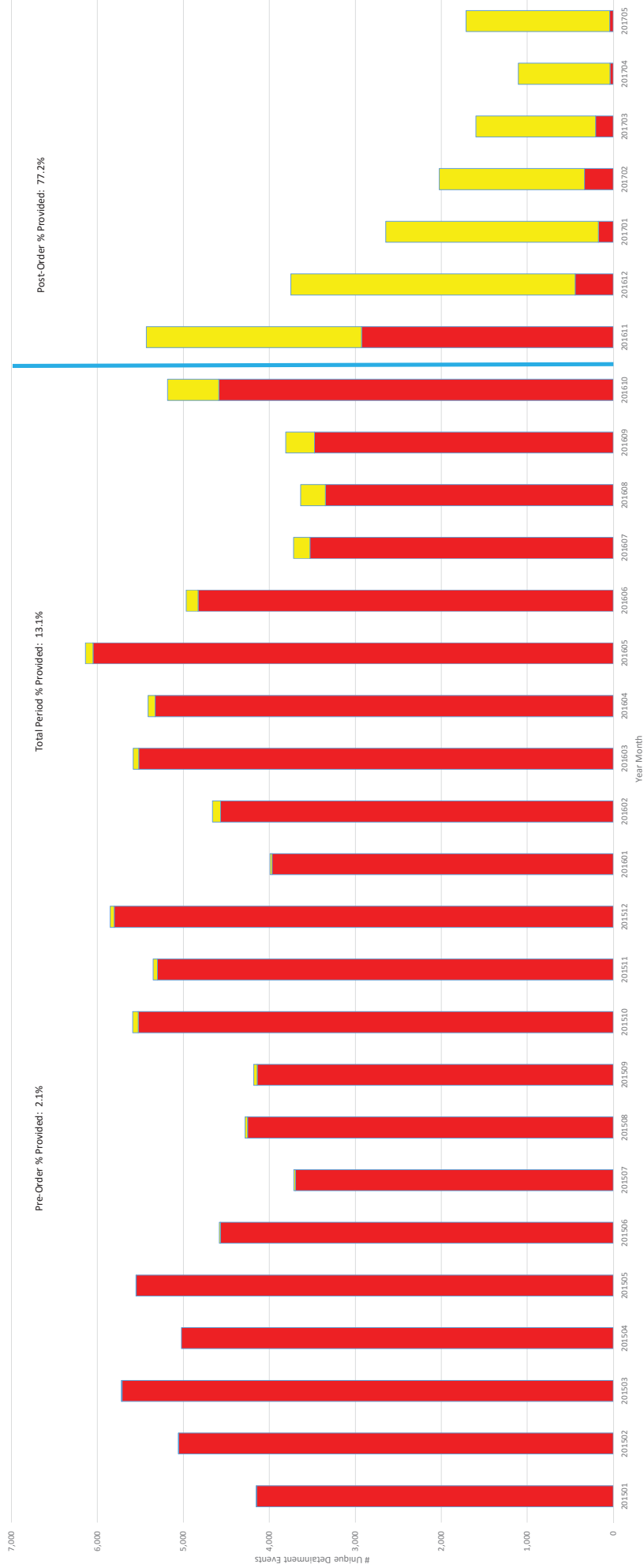
Court Docs (ECF Nos.)
Complaint, ECF No. 1
Protective Order, ECF No. 60
Decl. of J. Gaston Plaintiffs' Motion for PI, ECF No. 206-5
ORDER granting Preliminary Injunction, ECF No. 244
Defs.' Motion for Reconsideration, ECF No. 252
Pls.' Opp'n to Motion for Clarification, ECF No. 254
Defs.' Reply Motion for Clarification, ECF No. 257
ORDER denying Motion for Reconsideration, ECF No. 261
Discovery Responses
2017-02-09 Defs.' Resp. to Pls.' Interrogatories [Set Two], No. 22
Preliminary Injunction Hearing Exhibits
Ex. 078 (USA-0000001A-004A)
EX. 082 (USA000119A-122A (redacted))
EX. 086 (USA000321A (redacted))
EX. 097 (USA000654A-665A)
EX. 193 (10-16-15 Letter re e3M data)
EX. 194 (10-23-15 Letter e3DM)
EX. 383 (Analysis of e3DM data, including supporting native e3DM data)
Defs.' P.I. Hearing Ex. 5, Time In Custody Chart
Transcripts: Deposition of Trial Transcript
2016-11-14 P.I. Hearing Transcript
2016-11-15 P.I. Hearing Transcript
11-21-16 - Deposition of Antonio Trindade and all Accompanying Exhibits
Miscellaneous
GAO, Report to the Ranking Member, Committee on Homeland Security, Immigration Detention: <i>Additional Actions Needed to Strengthen DHS Management of Short-Term Holding Facility</i> (GAO-16-514) (May 2016)
Produced Documents
(beginning Bates numbers listed only; full document included unless specific range noted)
USA-0000652
USA-0000653
USA-0000699
USA-0000700-702
USA-0002184
USA 13028-13097
USA-0168380
USA-0168381
USA-0168382

USA-0168383
USA-0168384
USA-0168385
USA-0168386
USA-1473178
USA-1473179
USA-1473181
USA-1627256
USA-1627257
USA-1628267
USA-1628268
USA-1639558
USA-1639559
USA-1639560
USA-898862-898863
USA-952346-952347
USBP e3DM for Apps Booked into TCA Facilities 010115-060912
USBP e3DM for Apps Booked into TCA Facilities 092915-083116 Part 1 of 2
USBP e3DM for Apps Booked into TCA Facilities 092915-083116 Part 2 of 2

Order Requirement 1: Provision for Sleeping Mats and Blankets
Unique Detainment Events, Greater than 12 Hours
January, 2015 - May, 2017

■ Not Provided
■ Provided

Order: November, 2016

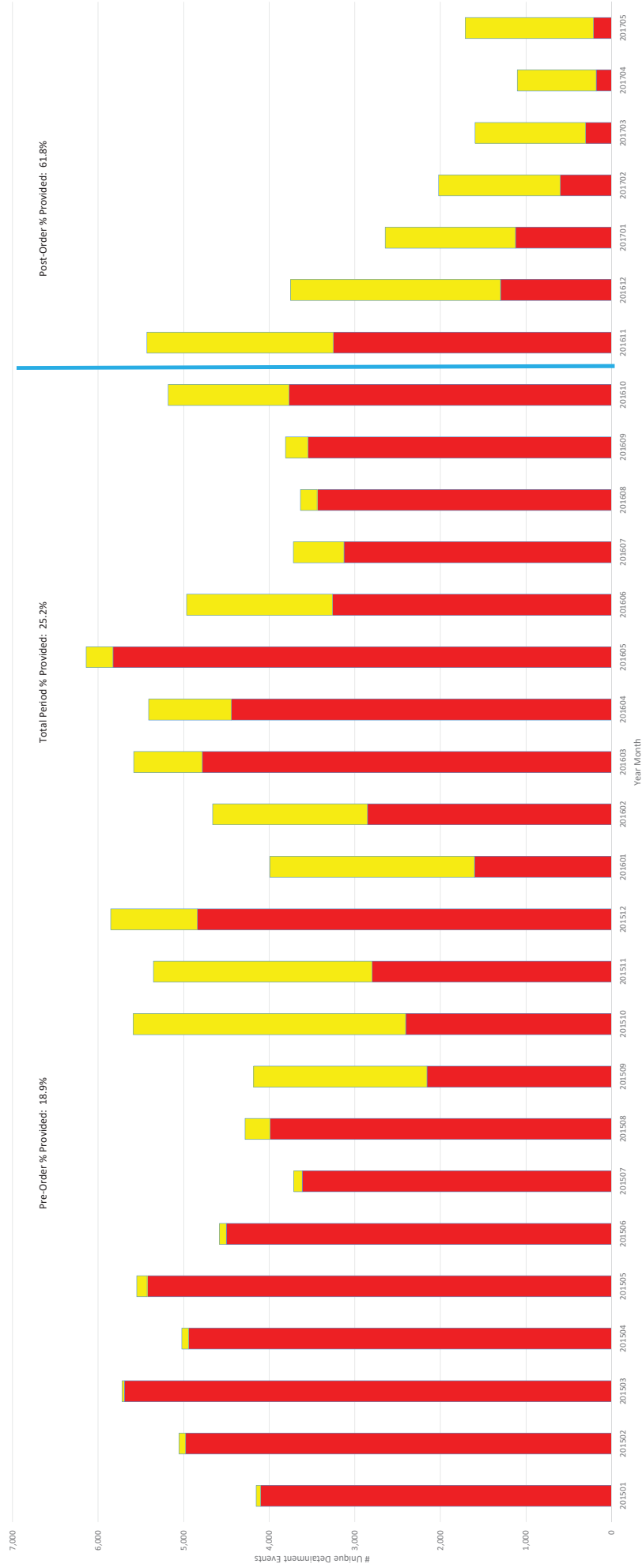


	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	3	2	8	-	2	15	19	28	42	65	50	49	26	93	66	83	89	137	190	288	334	595	2,502	3,308	2,476	1,688	1,390	1,066	1,671
Not Provided	4,151	5,054	5,713	5,023	5,548	4,567	3,695	4,254	4,140	5,524	5,303	5,803	3,967	4,568	5,518	5,328	6,051	4,829	3,528	3,347	3,475	4,588	2,929	442	171	335	206	37	40
Total	4,154	5,056	5,721	5,023	5,550	4,582	3,714	4,282	4,182	5,589	5,353	5,852	3,993	4,661	5,584	5,411	6,140	4,966	3,718	3,635	3,809	5,183	5,431	3,750	2,647	2,023	1,596	1,103	1,711
% Provided	0.1%	0.0%	0.1%	0.0%	0.0%	0.3%	0.5%	0.7%	1.0%	1.2%	0.9%	0.8%	0.7%	2.0%	1.2%	1.5%	1.4%	2.8%	5.1%	7.9%	8.8%	11.5%	46.1%	88.2%	93.5%	83.4%	87.1%	96.6%	97.7%

Order Requirement 2: Provision for Hygiene
Unique Detainment Events, Greater than 12 Hours
January, 2015 - May, 2017

■ Provided
■ Not Provided

Order: November, 2016

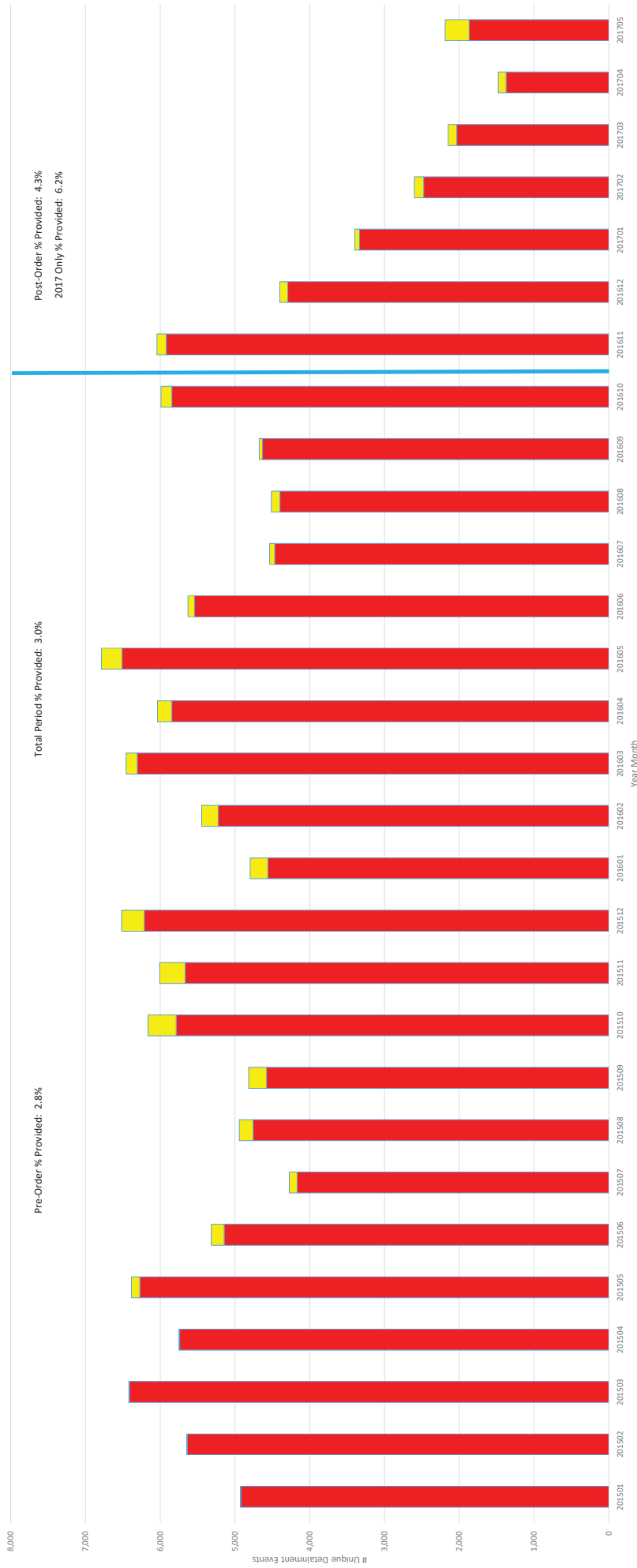


	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	50	79	28	79	121	81	98	287	2,025	3,184	2,555	1,009	2,392	1,808	801	965	314	1,706	592	194	258	1,413	2,175	2,453	1,523	1,421	1,292	923	1,500
Not Provided	4,104	4,977	5,693	4,944	5,429	4,501	3,616	3,995	2,157	2,405	2,798	4,843	1,601	2,853	4,783	4,446	5,826	3,260	3,126	3,441	3,551	3,770	3,256	1,297	1,124	602	304	180	211
Total	4,154	5,056	5,721	5,023	5,550	4,582	3,714	4,282	4,182	5,589	5,353	5,852	3,993	4,661	5,584	5,411	6,140	4,966	3,718	3,635	3,809	5,183	5,431	3,750	2,647	2,023	1,596	1,103	1,711
% Provided	1.2%	1.6%	0.5%	1.6%	2.2%	1.8%	2.6%	6.7%	48.4%	57.0%	47.7%	17.2%	59.9%	38.8%	14.3%	17.8%	5.1%	34.4%	15.9%	5.3%	6.8%	27.3%	40.0%	65.4%	57.5%	70.2%	81.0%	83.7%	87.7%

Order Requirement 3: Provision for Medical Screening

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

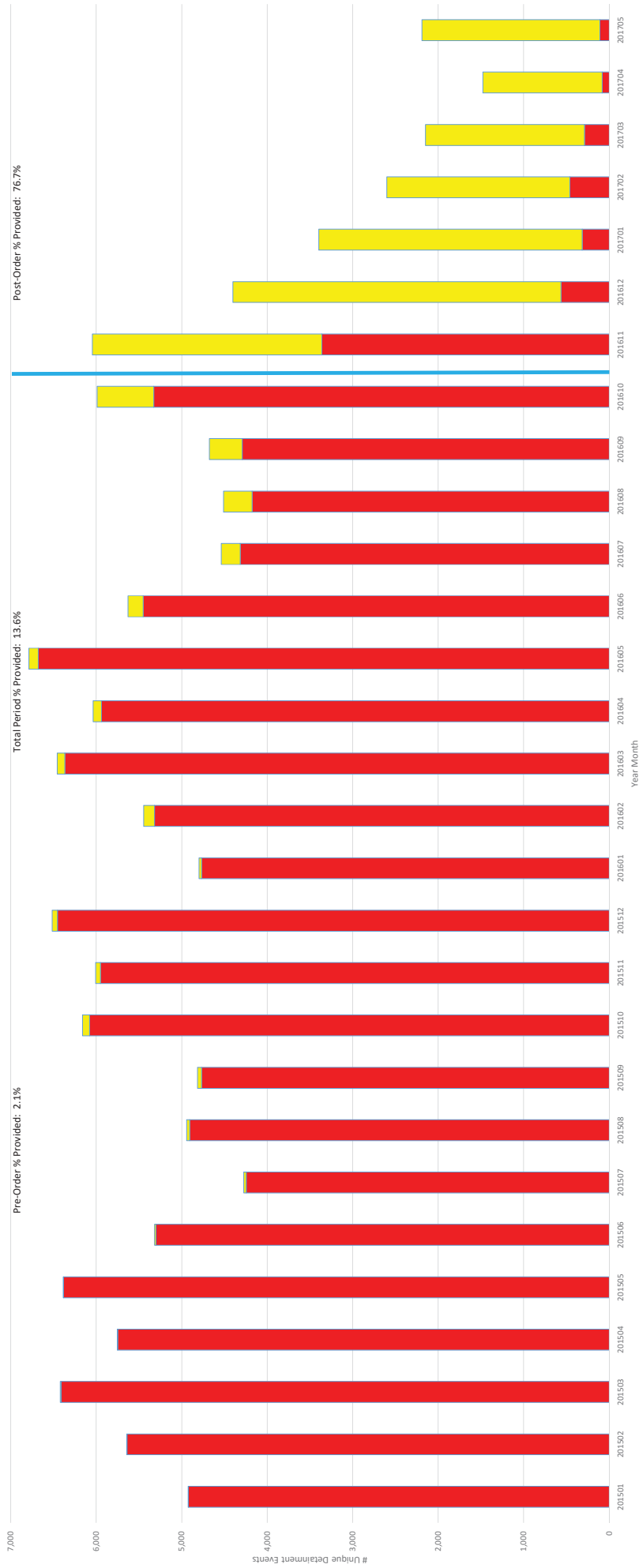
■ Provided
■ Not Provided

	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	4	5	7	11	111	173	106	184	239	375	341	302	237	224	147	191	277	87	67	115	45	145	126	109	63	123	116	105	322
Not Provided	4921	5639	6413	5740	6275	5145	4169	4758	4578	5786	5665	6215	4561	5223	6309	5846	6510	5541	4471	4397	4632	5846	5920	4293	3334	2477	2033	1373	1867
Total	4,925	5,644	6,420	5,751	6,386	5,318	4,275	4,942	4,817	6,161	6,006	6,517	4,798	5,447	6,456	6,037	6,787	5,628	4,538	4,512	4,677	5,991	6,046	4,402	3,397	2,600	2,149	1,478	2,189
% Provided	0.1%	0.1%	0.1%	0.2%	1.7%	3.3%	2.5%	3.7%	5.0%	6.1%	5.7%	4.6%	4.9%	4.1%	2.3%	3.2%	4.1%	1.5%	1.5%	2.5%	1.0%	2.4%	2.1%	2.5%	1.9%	4.7%	5.4%	7.1%	14.7%

Provision for Sleeping Mats
Unique Detainment Events
January, 2015 - May, 2017

■ Provided
■ Not Provided

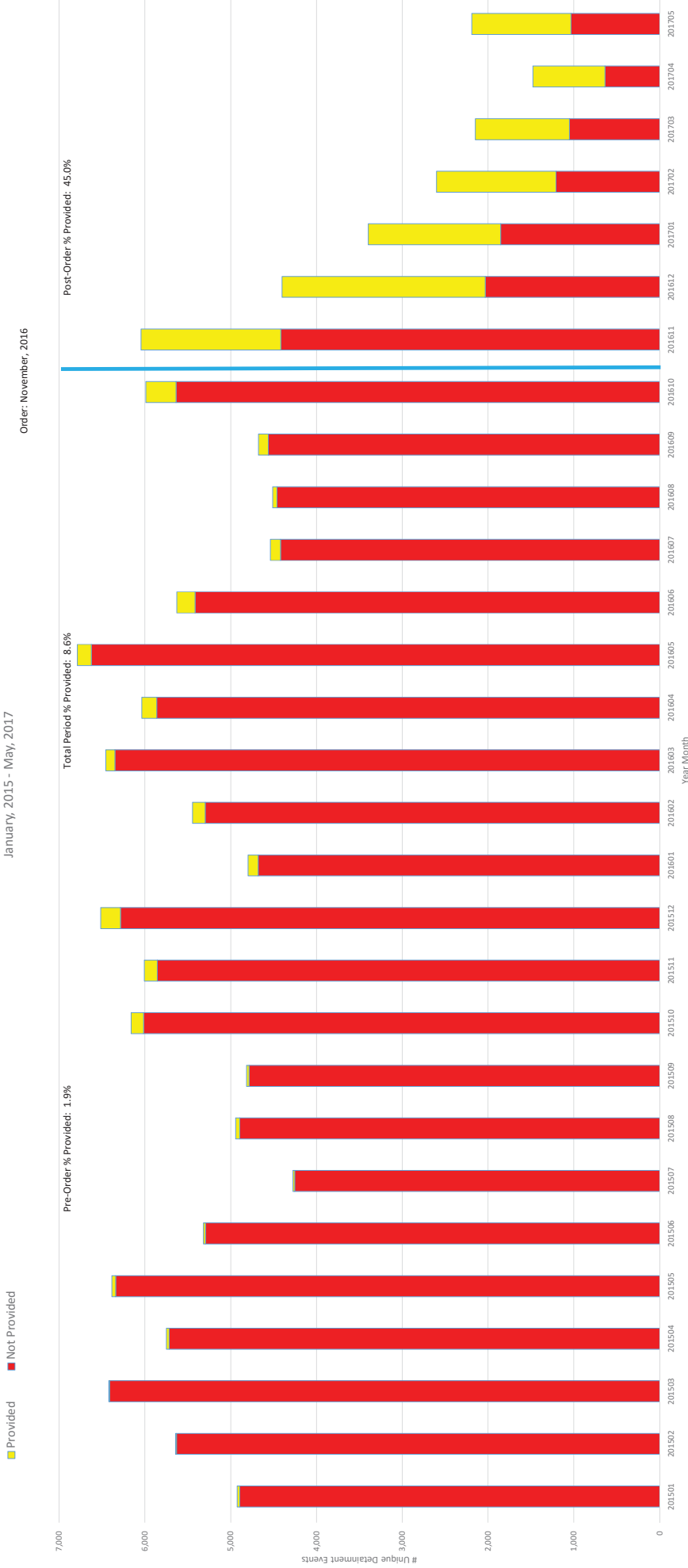
Order: November, 2016



	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	4	3	11	2	2	18	31	34	50	83	54	64	30	129	89	97	109	178	223	336	384	664	2,686	3,837	3,083	2,140	1,861	1,396	2,082
Not Provided	4,921	5,641	6,409	5,749	6,384	5,300	4,244	4,908	4,767	6,078	5,952	6,453	4,768	5,318	6,367	5,940	6,678	5,450	4,315	4,176	4,293	5,327	3,360	565	314	460	288	82	107
Total	4,925	5,644	6,420	5,751	6,386	5,318	4,275	4,942	4,817	6,161	6,006	6,517	4,798	5,447	6,456	6,037	6,787	5,628	4,538	4,512	4,677	5,991	6,046	4,402	3,397	2,600	2,149	1,478	2,189
% Provided	0.1%	0.1%	0.2%	0.0%	0.0%	0.3%	0.7%	0.7%	1.0%	1.3%	0.9%	1.0%	0.6%	2.4%	1.4%	1.6%	1.6%	3.2%	4.9%	7.4%	8.2%	11.1%	44.4%	87.2%	90.8%	82.3%	86.6%	94.5%	95.1%

Provision for Wipes or Showers
Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

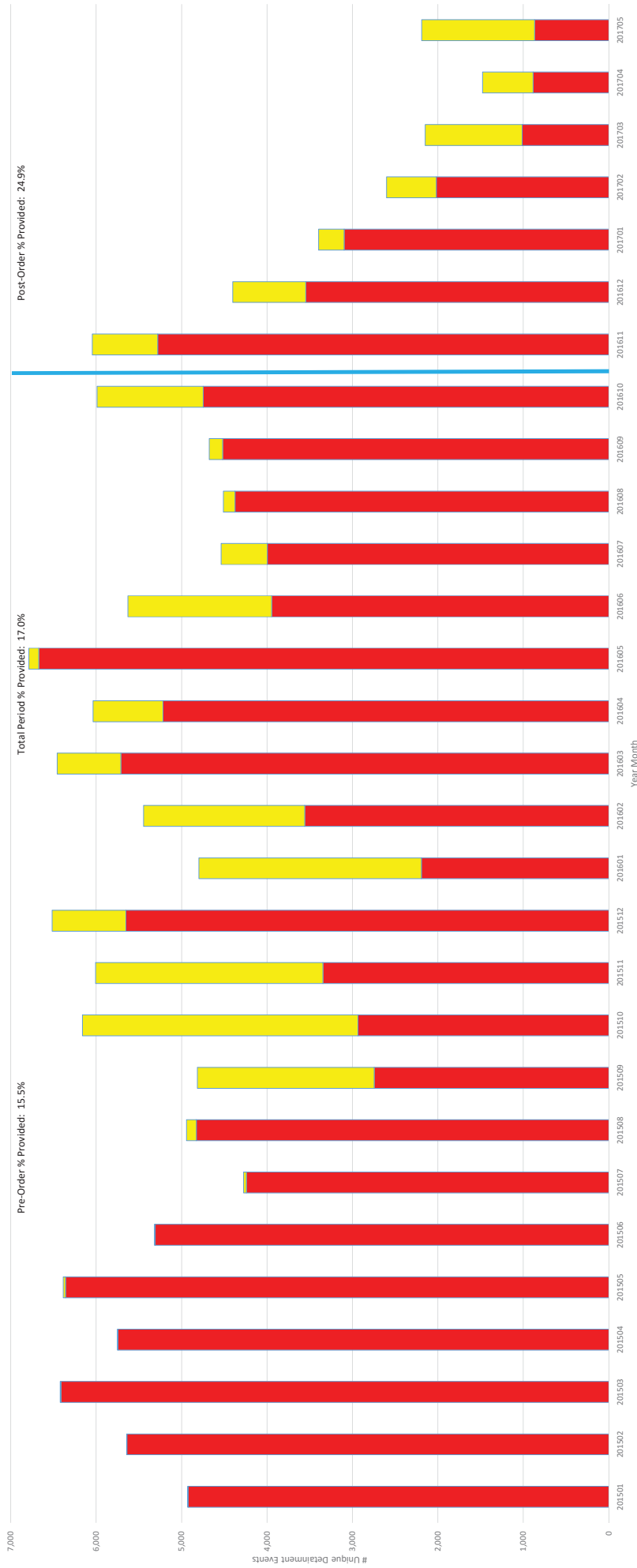


	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	29	11	7	32	45	24	21	45	31	145	149	233	117	150	105	174	163	211	119	52	117	352	1630	2368	1545	1391	1098	839	1155
Not Provided	4896	5633	6413	5719	6341	5294	4254	4897	4786	6016	5857	6284	4681	5297	6351	5863	6624	5417	4419	4460	4560	5639	4416	2034	1852	1209	1051	1034	1034
Total	4925	5644	6420	5751	6386	5318	4275	4942	4817	6161	6006	6517	4798	5447	6456	6037	6787	5628	4538	4512	4677	5991	6046	4402	3397	2600	2149	1478	2189
% Provided	0.6%	0.2%	0.1%	0.6%	0.7%	0.5%	0.5%	0.9%	0.6%	2.4%	2.5%	3.6%	2.4%	2.8%	1.6%	2.9%	2.4%	3.7%	2.6%	1.2%	2.5%	5.9%	27.0%	53.8%	45.5%	53.5%	51.1%	56.8%	52.8%

Provision for Dental Hygiene Products

Unique Detainment Events
January, 2015 - May, 2017

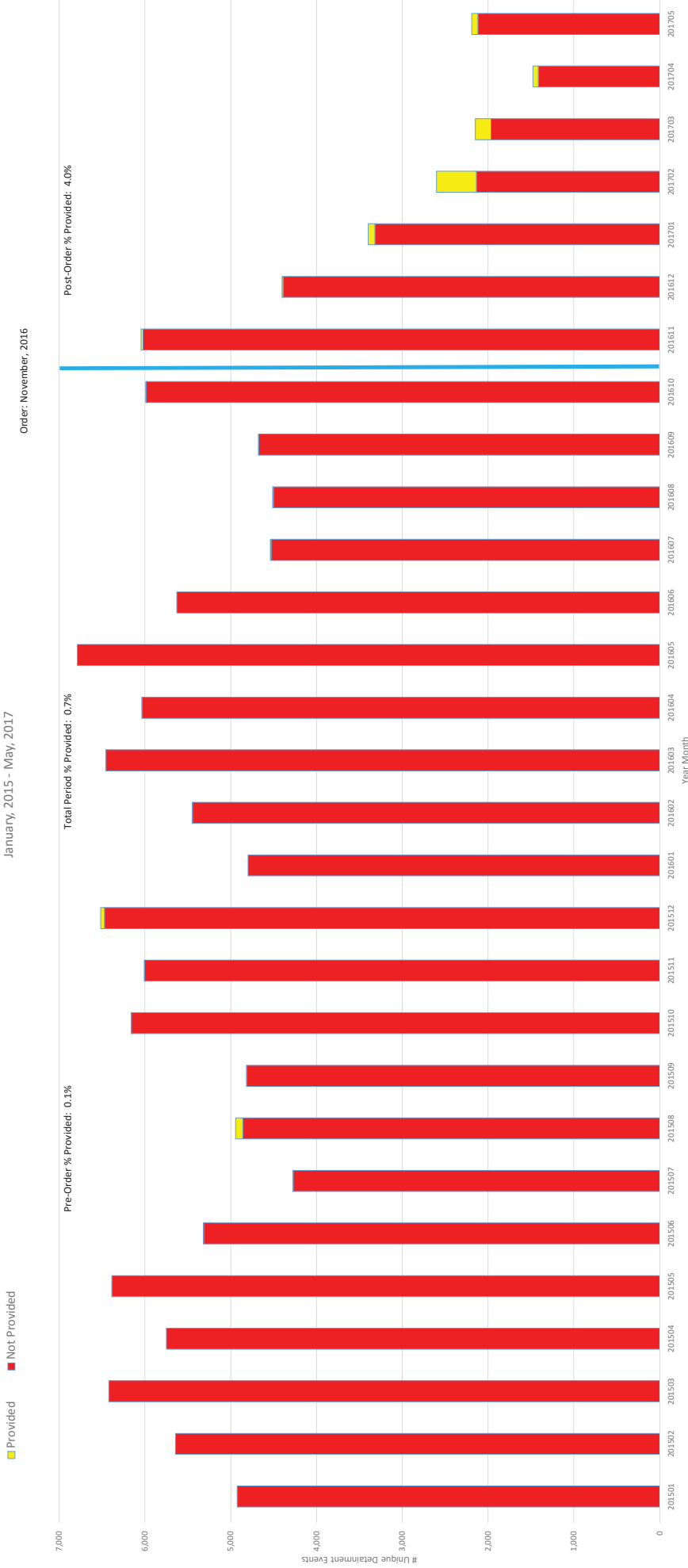
Order: November, 2016

■ Provided
■ Not Provided

	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	1	2	9	3	26	9	33	115	2,072	3,227	2,660	864	2,605	1,888	745	820	115	1,682	542	138	156	1,244	766	855	300	581	1,137	591	1,321
Not Provided	4,924	5,642	6,411	5,748	6,360	5,309	4,242	4,827	2,745	2,934	3,346	5,653	2,193	3,559	5,711	5,217	6,672	3,946	3,996	4,374	4,521	4,747	5,280	3,547	3,097	2,019	1,012	887	868
Total	4,925	5,644	6,420	5,751	6,386	5,318	4,275	4,942	4,817	6,161	6,006	6,517	4,798	5,447	6,456	6,037	6,787	5,628	4,538	4,512	4,677	5,991	6,046	4,402	3,397	2,600	2,149	1,478	2,189
% Provided	0.0%	0.0%	0.1%	0.1%	0.4%	0.2%	0.8%	2.3%	43.0%	52.4%	44.3%	13.3%	54.3%	34.7%	11.5%	13.6%	1.7%	29.9%	11.9%	3.1%	3.3%	20.8%	12.7%	19.4%	8.8%	22.3%	52.9%	40.0%	60.3%

Provision for Feminine Hygiene Products
Unique Detainment Events
January, 2015 - May, 2017

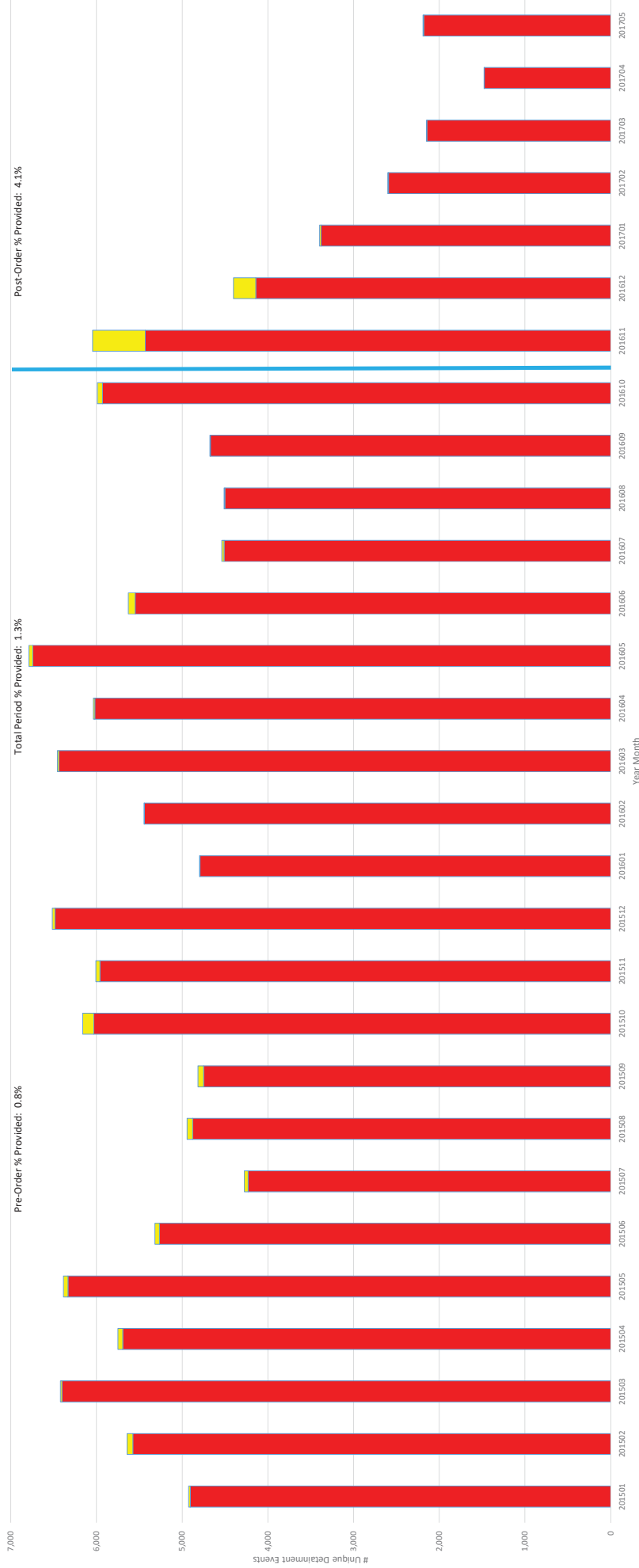
Order: November, 2016



	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	-	-	-	-	4	2	2	82	4	3	3	45	-	1	1	7	-	-	8	10	3	5	24	12	78	463	184	63	69
Not Provided	4,925	5,644	6,420	5,751	6,382	5,316	4,273	4,860	4,813	6,158	6,003	6,472	4,798	5,446	6,455	6,030	6,787	5,628	4,530	4,502	4,674	5,986	6,022	4,390	3,319	2,137	1,965	1,415	2,120
Total	4,925	5,644	6,420	5,751	6,386	5,318	4,275	4,942	4,817	6,161	6,006	6,517	4,798	5,447	6,456	6,037	6,787	5,628	4,538	4,512	4,677	5,991	6,046	4,402	3,397	2,600	2,149	1,478	2,189
% Provided	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	1.7%	0.1%	0.0%	0.0%	0.7%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.2%	0.2%	0.1%	0.1%	0.4%	0.3%	2.3%	17.8%	8.6%	4.3%	3.2%

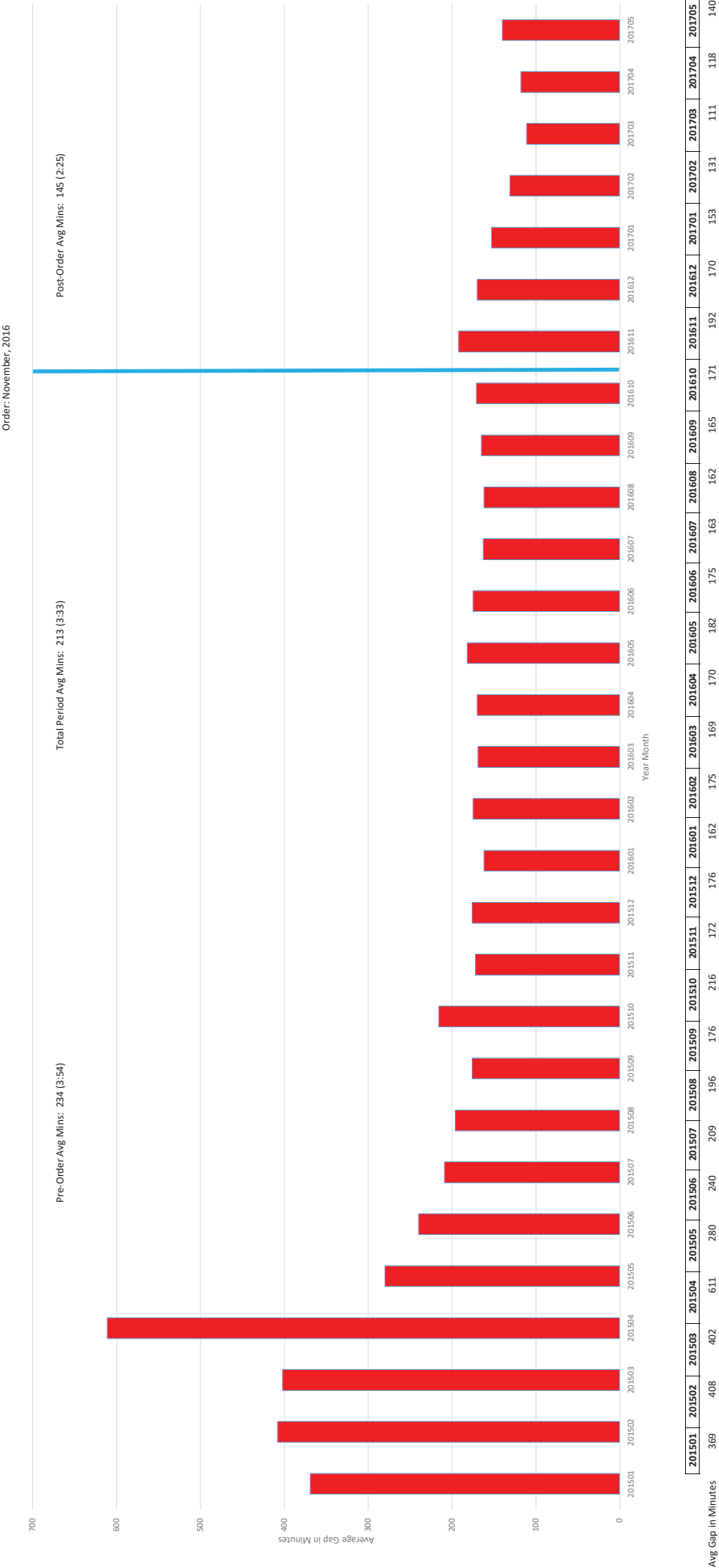
Provision for Baby Supplies
Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

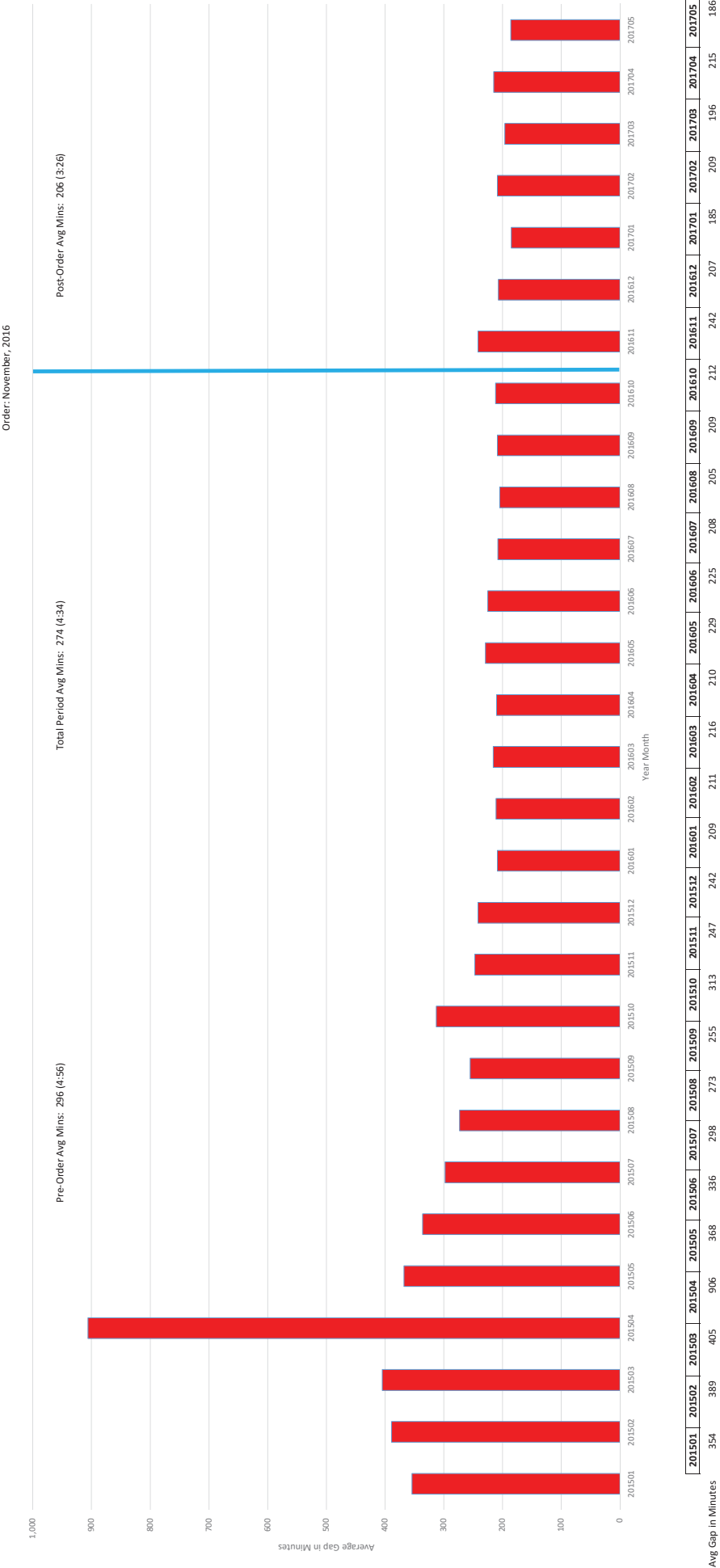


	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	22	69	15	58	52	52	45	64	66	129	45	35	7	7	16	18	44	79	27	11	7	60	614	260	19	8	3	4	9
Not Provided	4,903	5,575	6,405	5,693	6,334	5,266	4,230	4,878	4,751	6,032	5,961	6,482	4,791	5,440	6,440	6,019	6,743	5,549	4,511	4,501	4,670	5,931	5,432	4,142	3,378	2,592	2,146	1,474	2,180
Total	4,925	5,644	6,420	5,751	6,386	5,318	4,275	4,942	4,817	6,161	6,006	6,517	4,798	5,447	6,456	6,037	6,787	5,628	4,538	4,512	4,677	5,991	6,046	4,402	3,397	2,600	2,149	1,478	2,189
% Provided	0.4%	1.2%	0.2%	1.0%	0.8%	1.0%	1.1%	1.3%	1.4%	2.1%	0.7%	0.5%	0.1%	0.1%	0.2%	0.3%	0.6%	1.4%	0.6%	0.2%	0.1%	1.0%	10.2%	5.9%	0.6%	0.3%	0.1%	0.3%	0.8%

Gap Time Between Meals
Average Gap in Minutes
January, 2015 - May, 2017



Gap Time Between Burritos
Average Gap in Minutes
January, 2015 - May, 2017

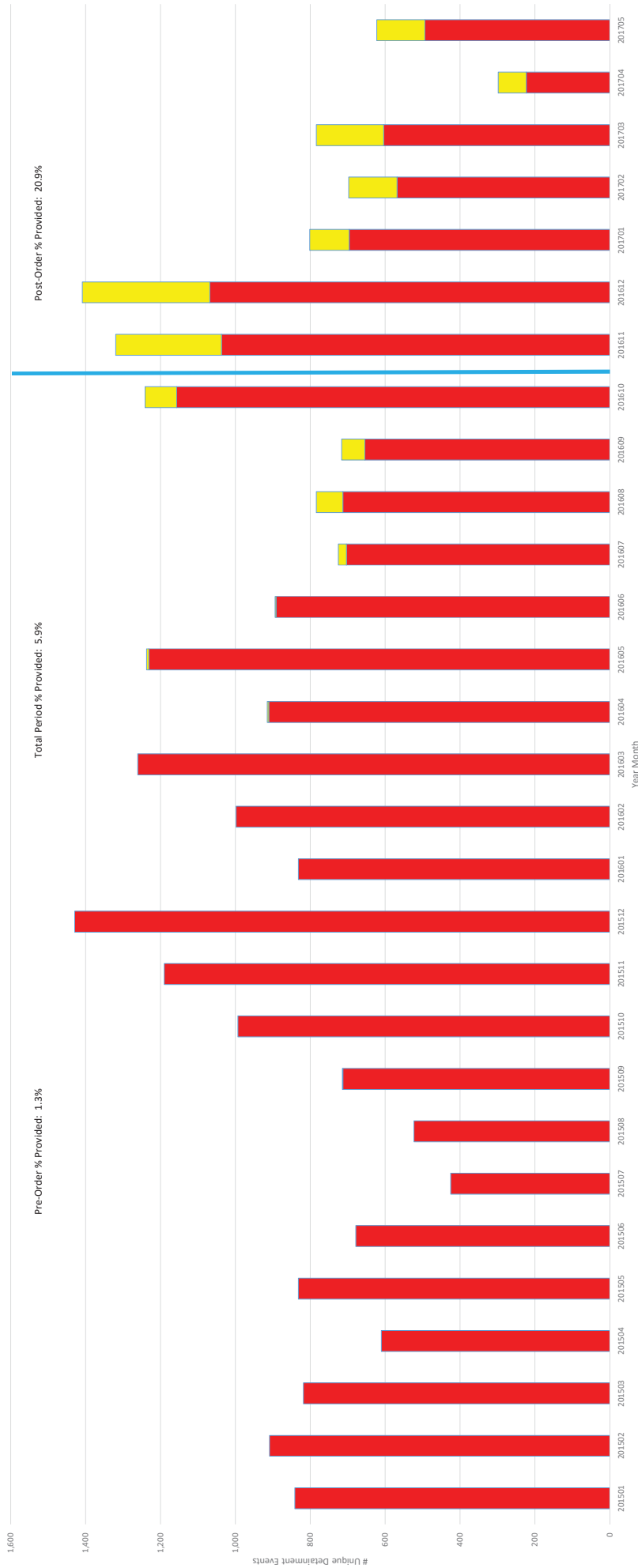




Provision for Sleeping Mats - Ajo Station
Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

■ Provided
■ Not Provided

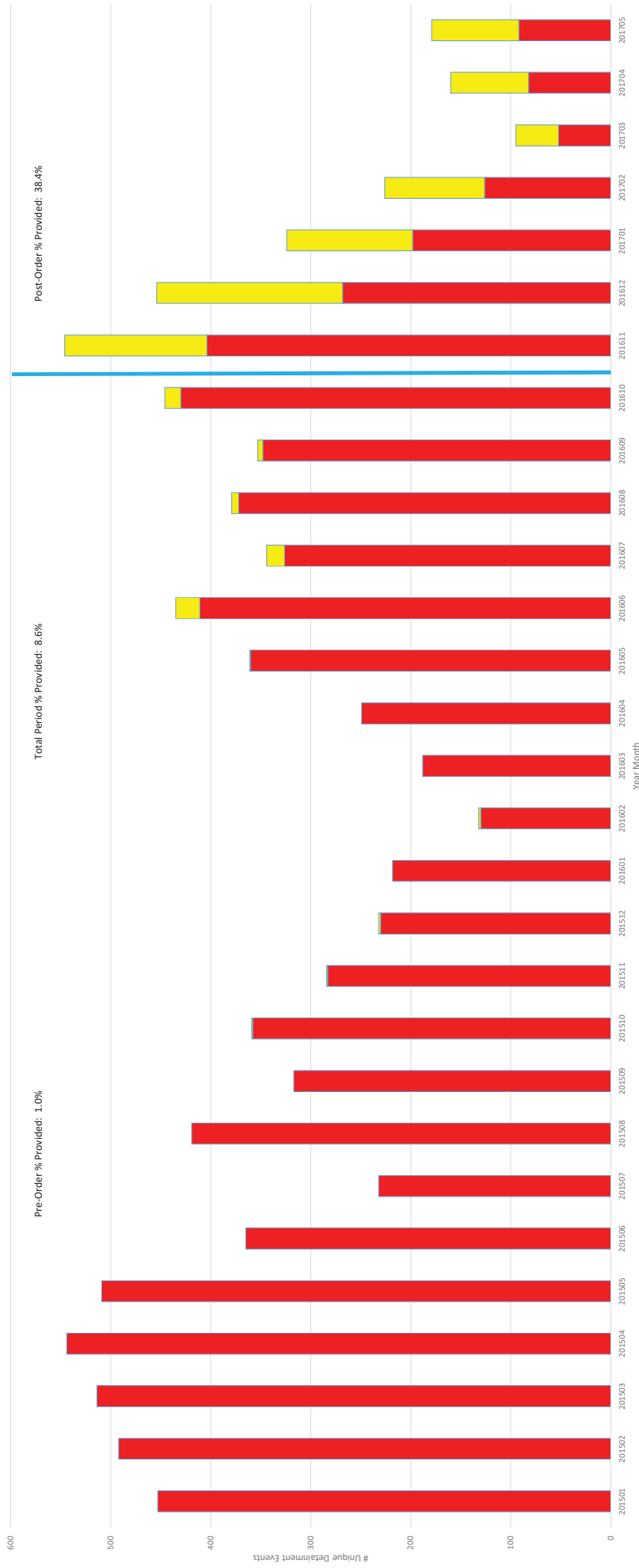


	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705	
Provided									1								4	6	3	22	71	62	84	283	341	105	129	180	75	128
Not Provided	841	909	818	610	832	678	425	523	713	993	1,190	1,429	832	998	1,261	911	1,231	891	703	713	654	1,157	1,037	1,068	696	568	604	223	494	206
Total	841	909	818	610	832	678	425	523	714	993	1,190	1,429	832	998	1,261	915	1,237	894	725	784	716	1,241	1,320	1,409	801	697	784	298	622	622
% Provided	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.5%	0.3%	3.0%	9.1%	8.7%	6.8%	21.4%	24.2%	13.1%	18.5%	23.0%	25.2%	20.8%	20.8%

Provision for Sleeping Mats - Brian Terry Station

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

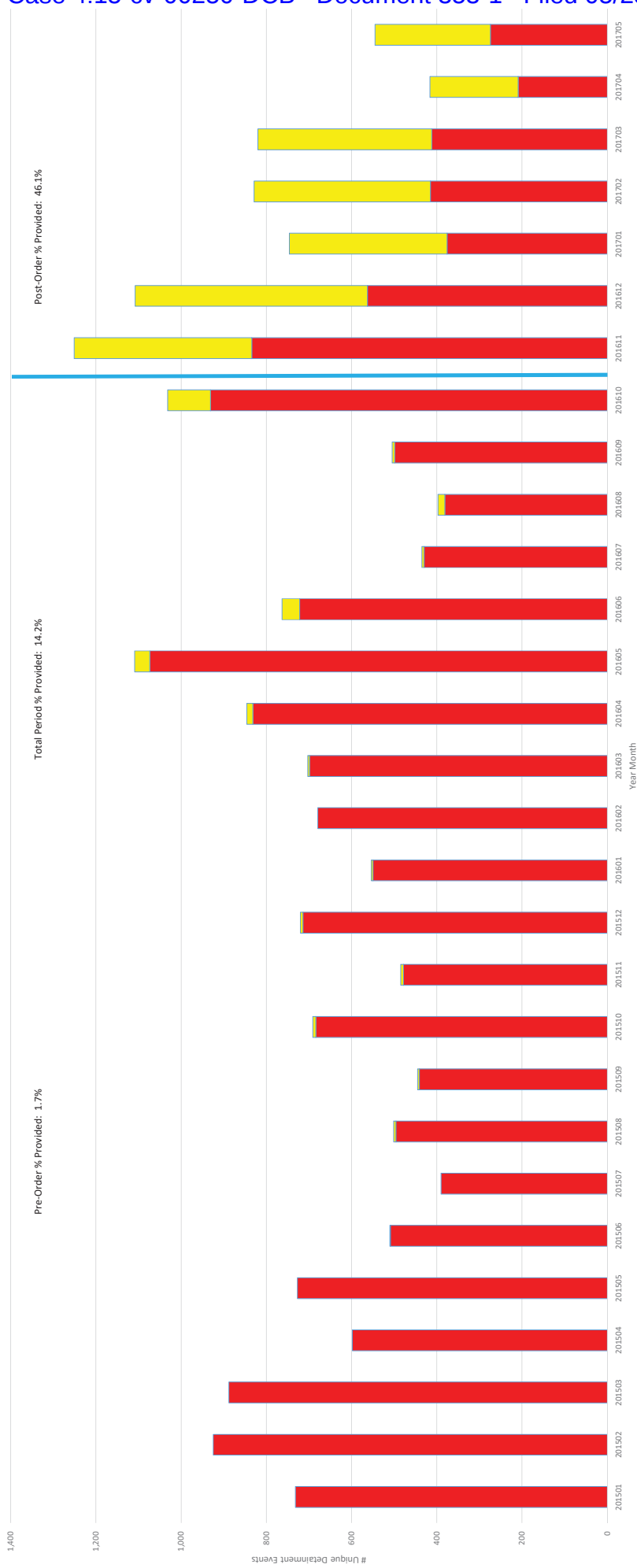
■ Provided
■ Not Provided

	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	-	-	-	-	-	-	-	-	-	1	1	2	-	2	-	-	1	24	18	7	5	16	142	186	126	100	43	78	87
Not Provided	453	492	514	544	509	365	232	419	317	358	283	230	218	130	188	249	360	411	326	372	348	430	404	268	198	126	52	82	92
Total	453	492	514	544	509	365	232	419	317	359	284	232	218	132	188	249	361	435	344	379	353	446	546	454	324	226	95	160	179
% Provided	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.4%	0.9%	0.0%	1.5%	0.0%	0.0%	0.3%	5.5%	5.2%	1.8%	1.4%	3.6%	26.0%	41.0%	38.9%	44.2%	45.3%	48.8%	48.6%

Provision for Sleeping Mats - Casa Grande Station

Unique Detainment Events
January, 2015 - May, 2017

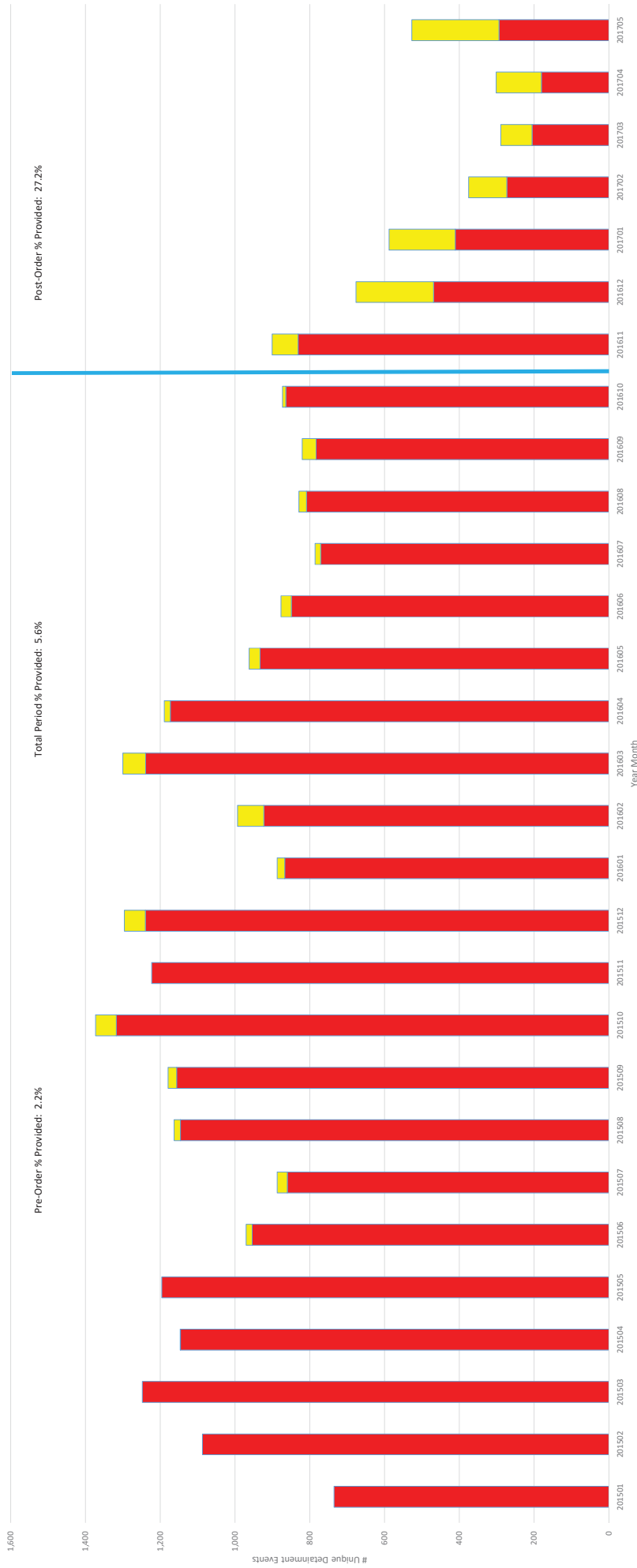
Order: November, 2016



	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Not Provided	732	925	888	598	727	509	390	496	441	684	478	714	550	679	699	832	1,074	722	430	381	499	931	834	563	376	415	412	209	271
Total	732	925	888	598	727	510	390	501	445	691	485	720	554	679	703	846	1,109	763	435	397	505	1,032	1,251	1,108	746	829	820	416	545
% Provided	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	1.0%	0.9%	1.0%	1.4%	0.8%	0.7%	0.0%	0.6%	1.7%	3.2%	5.4%	1.1%	4.0%	1.2%	9.8%	33.3%	49.2%	49.6%	49.9%	49.8%	49.8%	49.7%

Provision for Sleeping Mats - Douglas Station
Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016



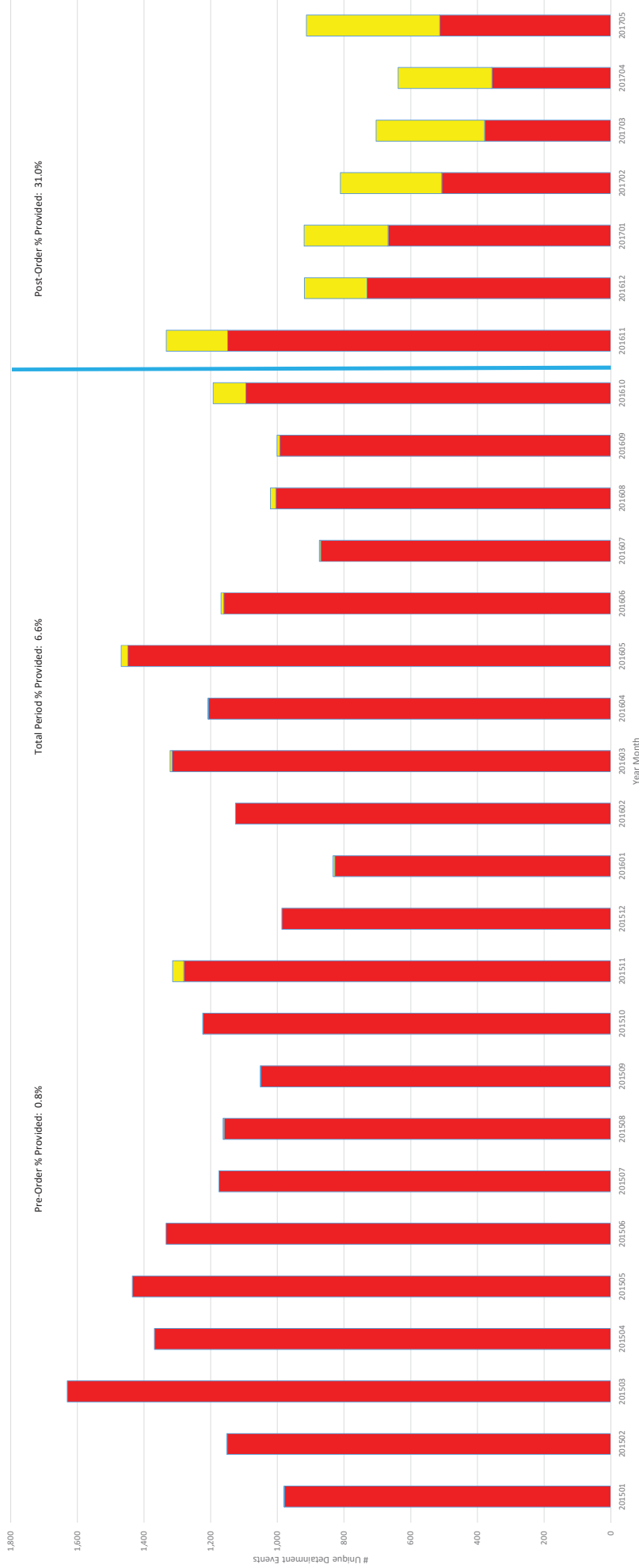
	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	-	-	-	-	-	16	27	17	23	55	-	56	20	70	61	16	29	28	15	20	37	9	70	207	177	102	84	121	233
Not Provided	735	1,087	1,248	1,146	1,196	954	860	1,146	1,156	1,318	1,223	1,240	867	923	1,239	1,173	933	849	771	809	783	864	831	469	411	273	205	180	294
Total	735	1,087	1,248	1,147	1,196	970	887	1,163	1,179	1,373	1,273	1,296	887	993	1,300	1,189	962	877	786	829	820	873	901	676	588	375	289	301	527
% Provided	0.0%	0.0%	0.0%	0.1%	0.0%	1.6%	3.0%	1.5%	2.0%	4.0%	0.0%	4.3%	2.3%	7.0%	4.7%	1.3%	3.0%	3.2%	1.9%	2.4%	4.5%	1.0%	7.8%	30.6%	30.1%	27.2%	29.1%	40.2%	44.2%

Provision for Sleeping Mats - Nogales Station

Unique Detainment Events

January, 2015 - May, 2017

Order: November, 2016

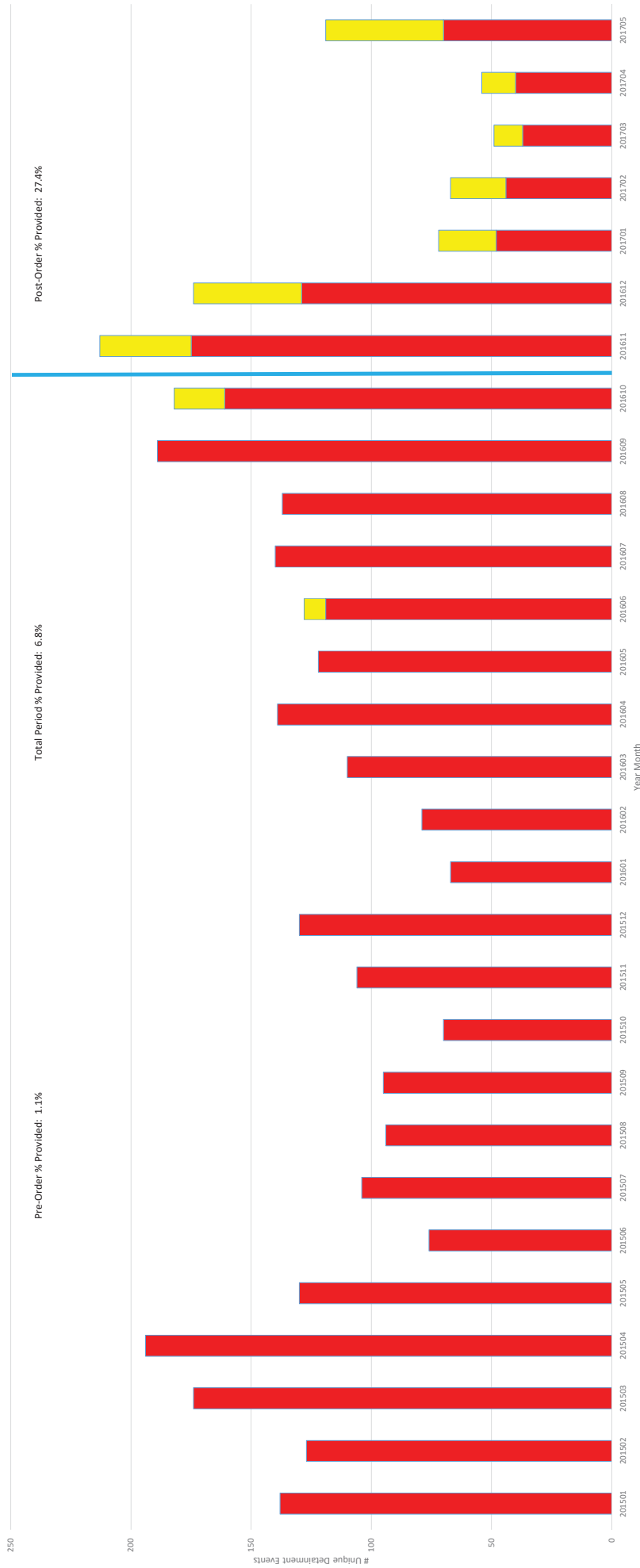
■ Provided
■ Not Provided

	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	1	1	-	-	-	-	-	3	1	1	33	-	5	-	6	1	20	8	4	16	8	98	184	188	252	304	326	282	400
Not Provided	979	1,151	1,631	1,369	1,435	1,334	1,175	1,160	1,050	1,223	1,281	987	828	1,126	1,316	1,207	1,449	1,161	870	1,005	993	1,095	1,149	731	668	507	378	356	513
Total	980	1,152	1,631	1,369	1,435	1,334	1,175	1,163	1,051	1,224	1,314	987	833	1,126	1,322	1,208	1,469	1,169	874	1,021	1,091	1,293	1,333	919	920	811	704	638	913
% Provided	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.1%	0.1%	2.5%	0.0%	0.6%	0.0%	0.5%	0.1%	1.4%	0.7%	0.5%	1.6%	0.8%	8.2%	13.8%	20.5%	27.4%	37.5%	46.3%	44.2%	43.8%

Provision for Sleeping Mats - Sonoita Station
Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

■ Provided
■ Not Provided



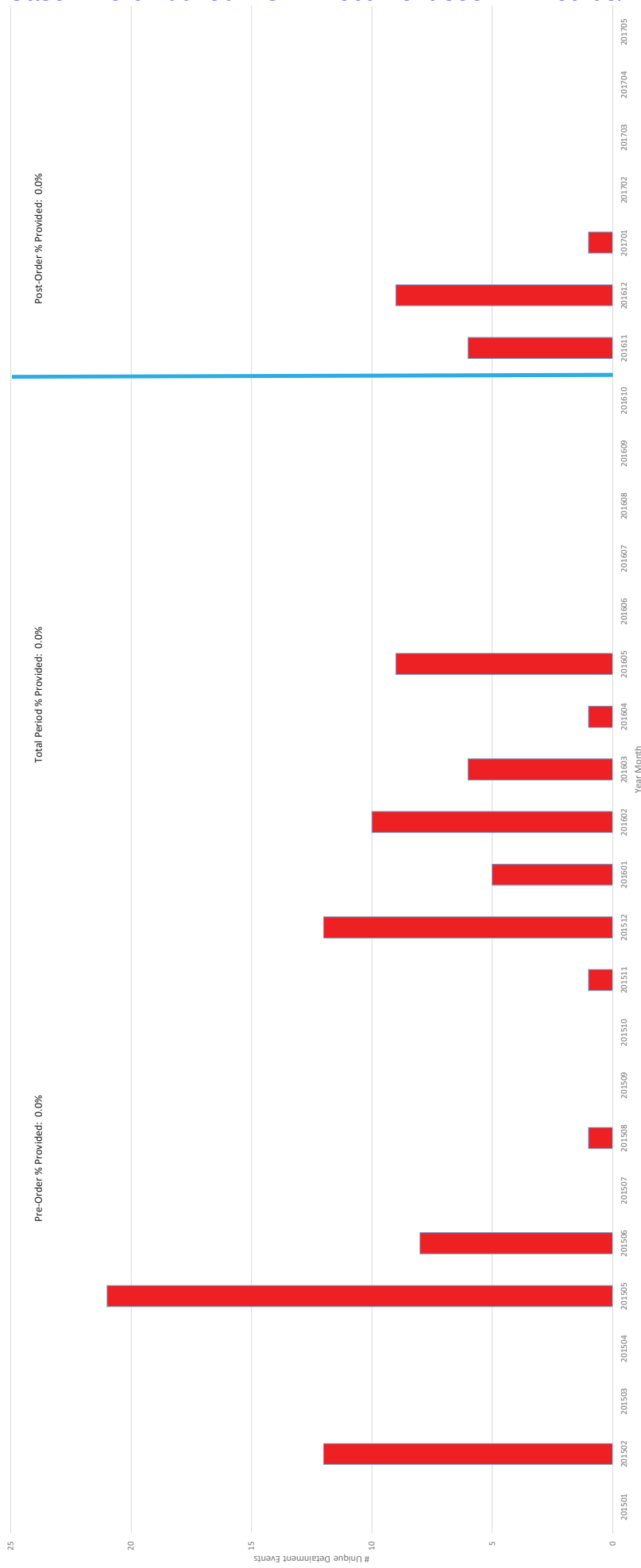
	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	138	127	174	194	130	76	104	94	95	70	106	130	67	79	110	139	122	119	140	137	189	161	175	129	48	24	23	12	14
Not Provided	138	127	174	194	130	76	104	94	95	70	106	130	67	79	110	139	122	119	140	137	189	161	175	129	48	24	23	12	14
Total	138	127	174	194	130	76	104	94	95	70	106	130	67	79	110	139	122	119	140	137	189	161	175	129	48	24	23	12	14
% Provided	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7.0%	0.0%	0.0%	0.0%	11.5%	17.8%	25.9%	33.3%	34.3%	24.5%	25.9%	41.7%

Provision for Sleeping Mats - Tucson Sector Nogales Processing Center

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

■ Provided
■ Not Provided

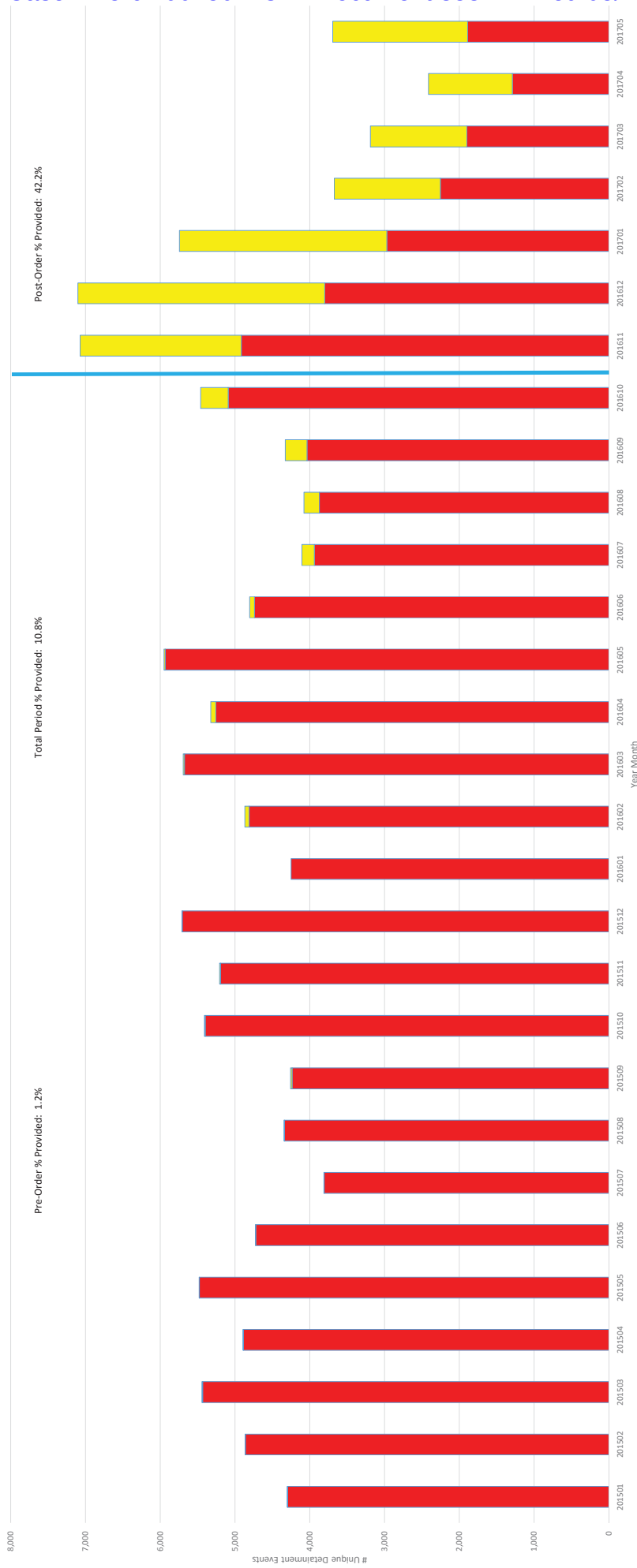


	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Not Provided	-	12	-	-	21	8	-	1	-	-	1	12	5	10	6	1	9	-	-	-	-	-	6	9	1	-	-	-	-
Total	-	12	-	-	21	8	-	1	-	-	1	12	5	10	6	1	9	-	-	-	-	-	6	9	1	-	-	-	-
% Provided	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Provision for Sleeping Mats - Tucson Sector Tucson Coordination Center

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

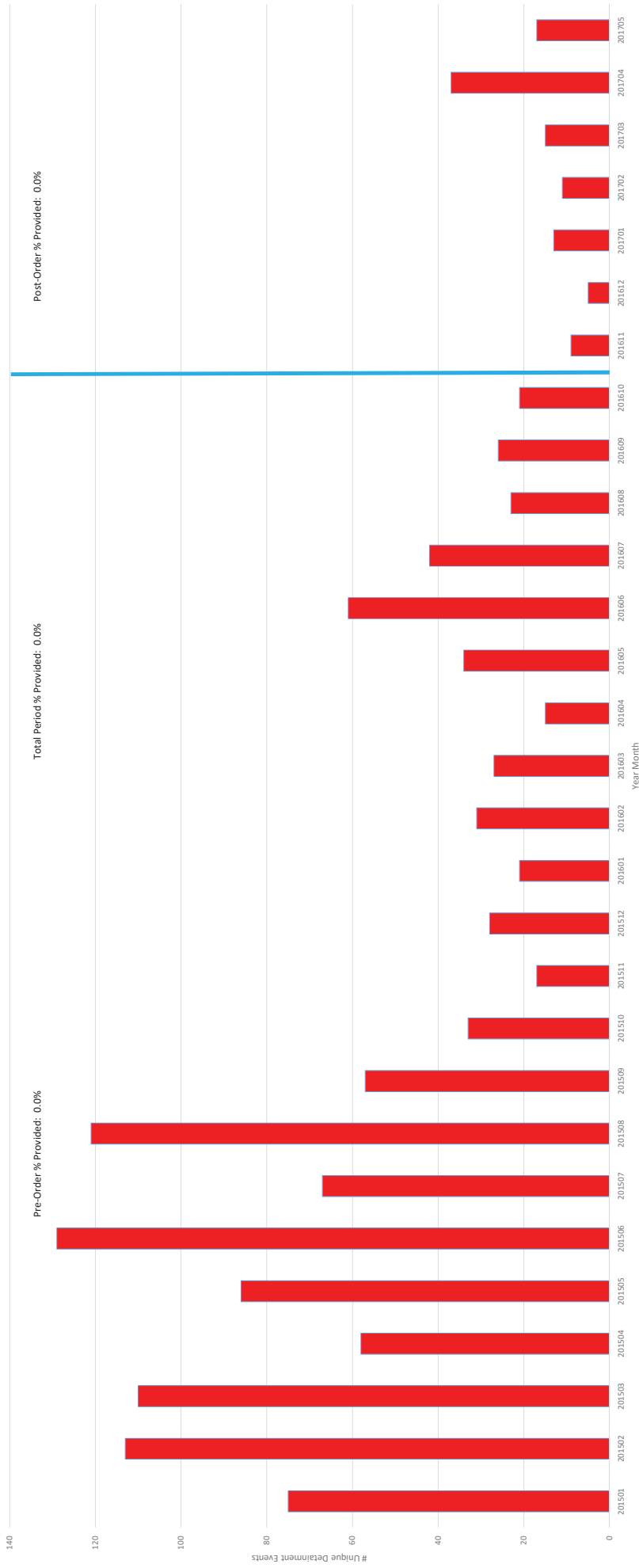
■ Provided
■ Not Provided

	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	3	2	11	1	2	1	4	9	22	10	13	2	-	58	18	67	18	65	163	208	290	370	2,159	3,301	2,774	1,420	1,290	1,122	1,805
Not Provided	4,298	4,861	5,432	4,887	5,478	4,723	3,808	4,337	4,236	5,398	5,194	5,706	4,251	4,810	5,676	5,258	5,932	4,739	3,940	3,870	4,037	5,091	4,914	3,802	2,969	2,252	1,898	1,289	1,888
Total	4,301	4,863	5,443	4,888	5,480	4,724	3,812	4,346	4,258	5,408	5,207	5,708	4,251	4,868	5,694	5,325	5,950	4,804	4,103	4,078	4,327	5,461	7,073	7,103	5,743	3,672	3,188	2,411	3,693
% Provided	0.1%	0.0%	0.2%	0.0%	0.0%	0.0%	0.1%	0.2%	0.5%	0.2%	0.2%	0.0%	0.0%	1.2%	0.3%	1.3%	0.3%	1.4%	4.0%	5.1%	6.7%	6.8%	30.5%	46.5%	48.3%	38.7%	40.5%	46.5%	48.9%

Provision for Sleeping Mats - Tucson Station
Unique Detainment Events
January, 2015 - May, 2017

■ Provided
■ Not Provided

Order: November, 2016

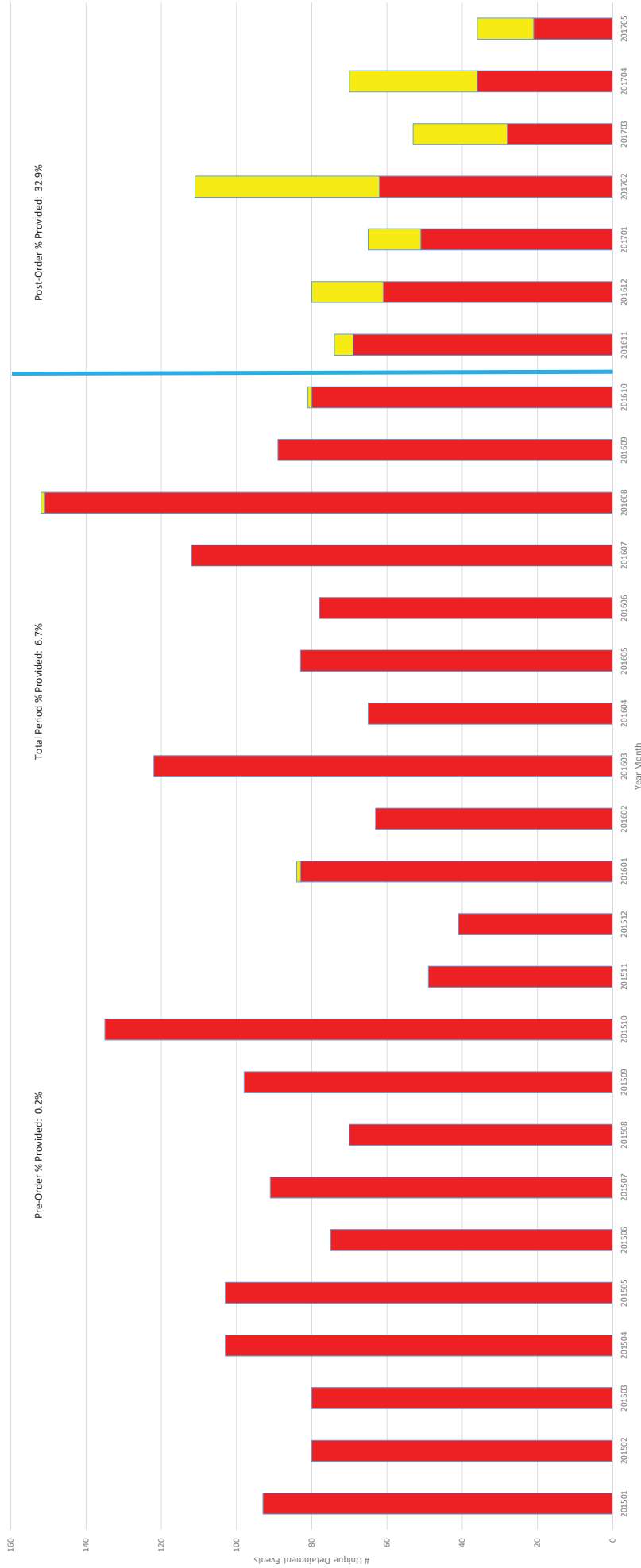


201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
75	113	110	58	86	129	67	121	57	33	17	28	21	31	27	15	34	61	42	23	26	21	9	5	13	11	15	37	17
75	113	110	58	86	129	67	121	57	33	17	28	21	31	27	15	34	61	42	23	26	21	9	5	13	11	15	37	17
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Provision for Sleeping Mats - Wilcox Station
Unique Detainment Events
January, 2015 - May, 2017

■ Provided
■ Not Provided

Order: November, 2016

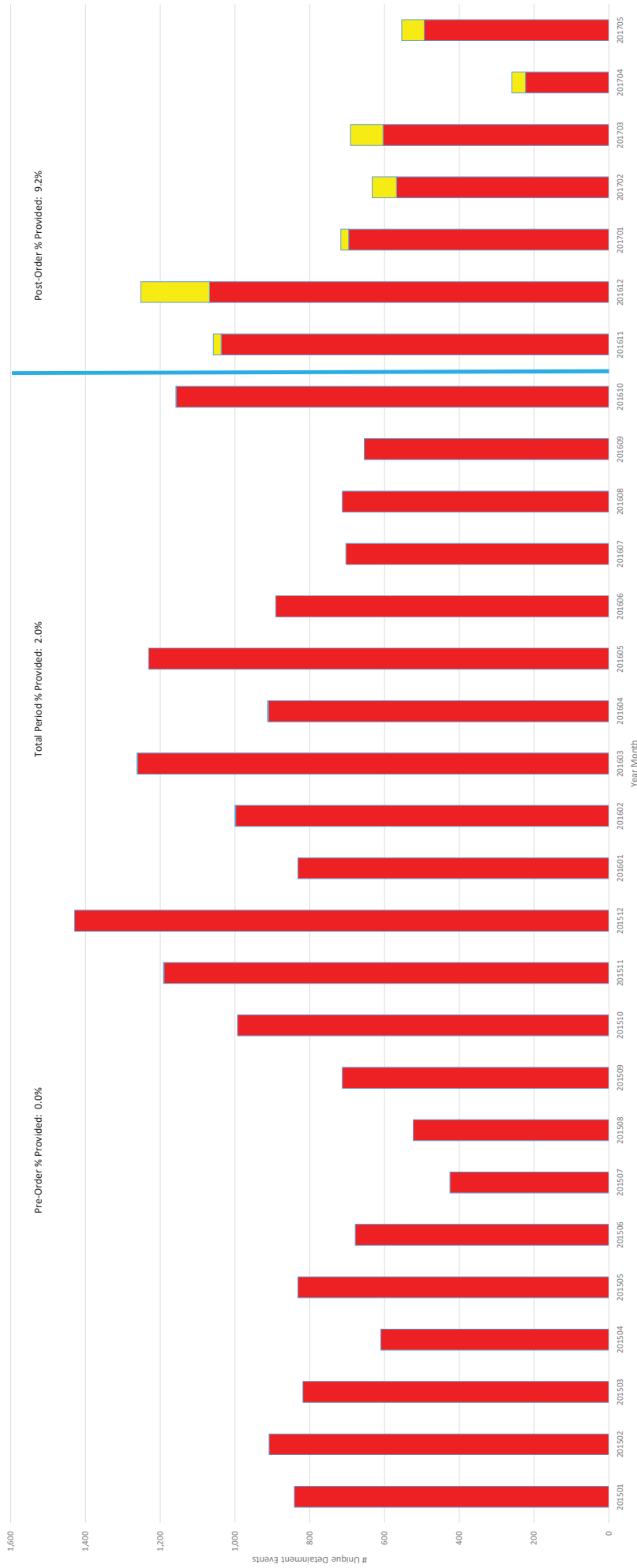


	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	1	-	5	19	14	49	25	34	15
Not Provided	93	80	80	103	103	103	75	91	70	98	135	49	83	63	122	65	83	78	112	151	89	80	69	61	51	62	28	36	21
Total	93	80	80	103	103	103	75	91	70	98	135	49	84	63	122	65	83	78	112	152	89	81	74	80	65	111	53	70	36
% Provided	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.7%	0.0%	1.2%	6.8%	23.8%	21.5%	44.1%	47.2%	48.6%	41.7%

Provision for Wipes or Showers - Ajo Station
Unique Detainment Events
January, 2015 - May, 2017

■ Provided
■ Not Provided

Order: November, 2016

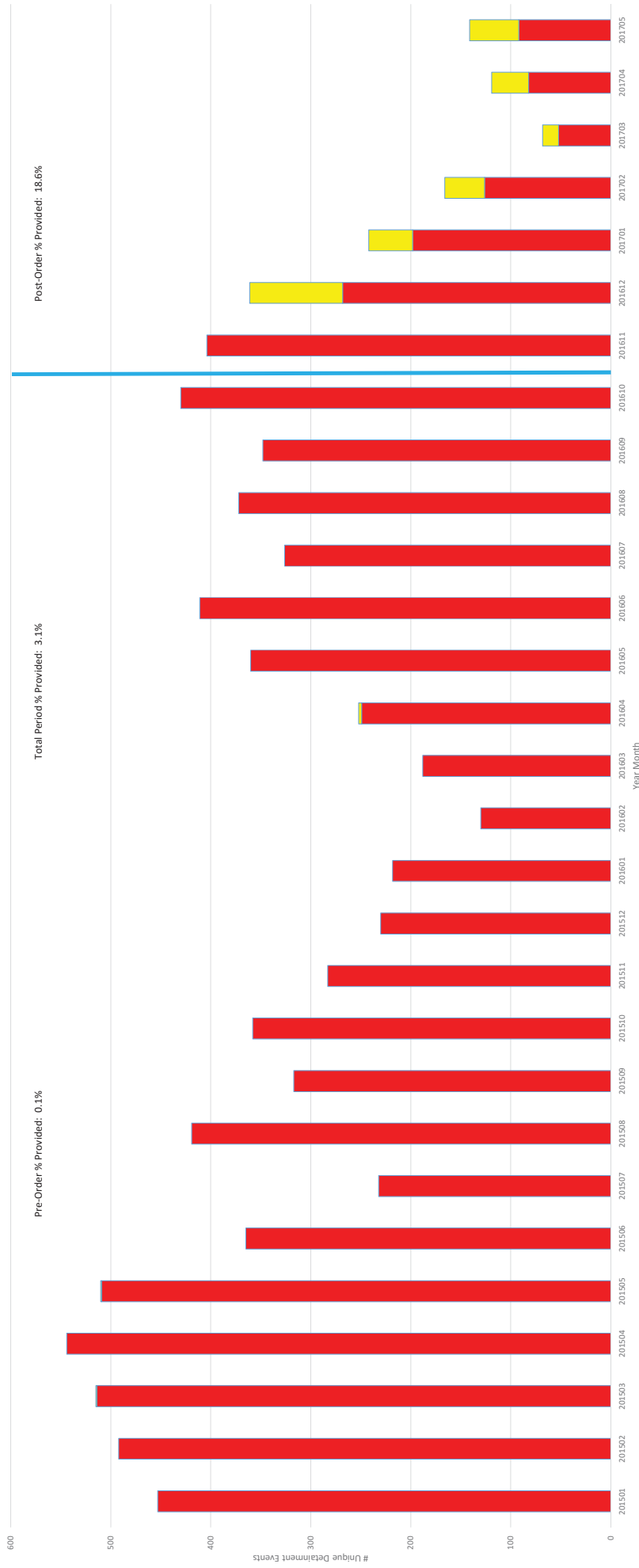


	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	-	-	-	-	-	-	-	-	-	1	-	-	-	2	1	2	-	-	-	-	-	1	21	184	21	65	87	36	60
Not Provided	841	909	818	610	832	678	425	523	713	993	1,190	1,429	832	988	1,261	911	1,231	891	703	713	654	1,157	1,037	1,068	568	604	623	494	223
Total	841	909	818	610	832	678	425	523	713	993	1,191	1,429	832	1,000	1,262	913	1,231	891	703	713	654	1,158	1,058	1,252	717	633	691	259	554
% Provided	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.2%	0.1%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	2.0%	14.7%	2.9%	10.3%	12.6%	13.9%	10.8%

Provision for Wipes or Showers - Brian Terry Station

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

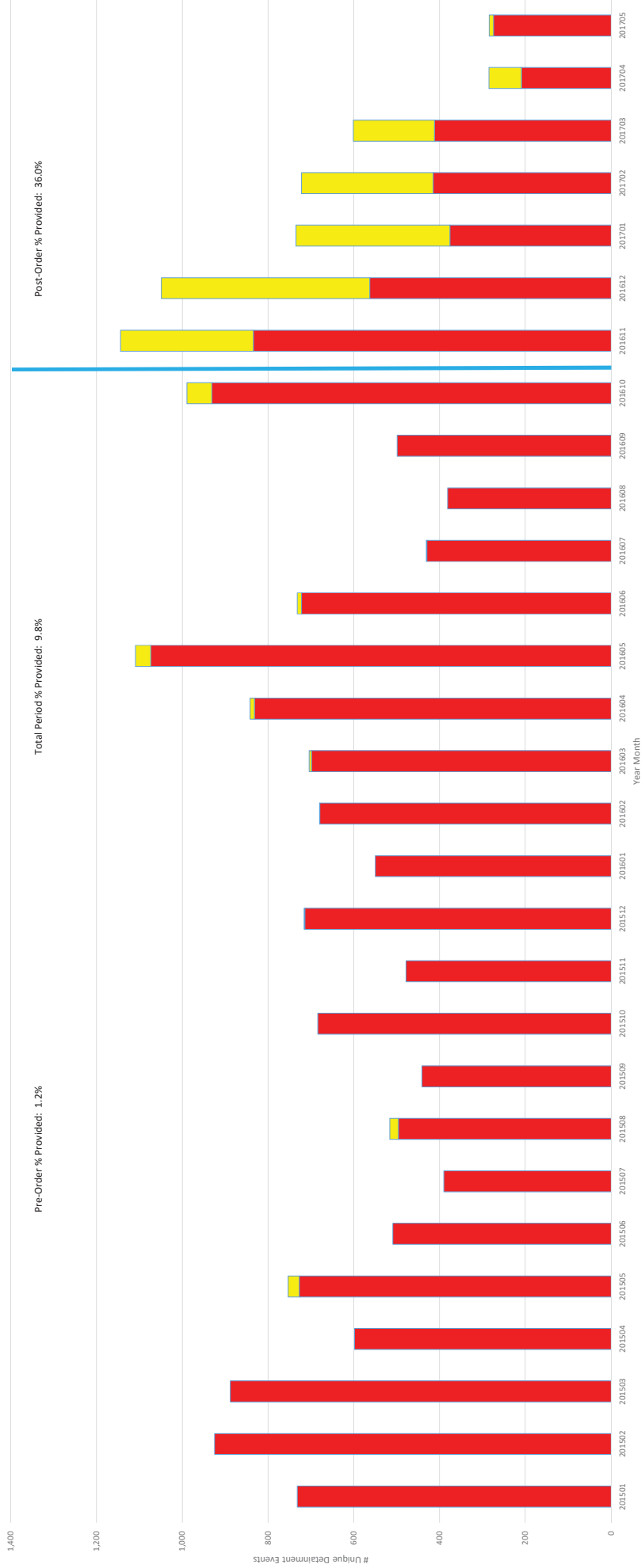
■ Provided
■ Not Provided

	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	-	-	1	-	1	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	93	44	40	16	37	49
Not Provided	453	492	514	544	509	365	232	419	317	358	283	230	218	130	188	249	360	411	326	372	348	430	404	268	198	126	52	82	92
Total	453	492	515	544	510	365	232	419	317	358	283	230	218	130	188	252	360	411	326	372	348	430	404	361	242	166	68	119	141
% Provided	0.0%	0.0%	0.2%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	25.8%	18.2%	24.1%	23.5%	31.1%	34.8%

Provision for Wipes or Showers - Case Grande Station

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

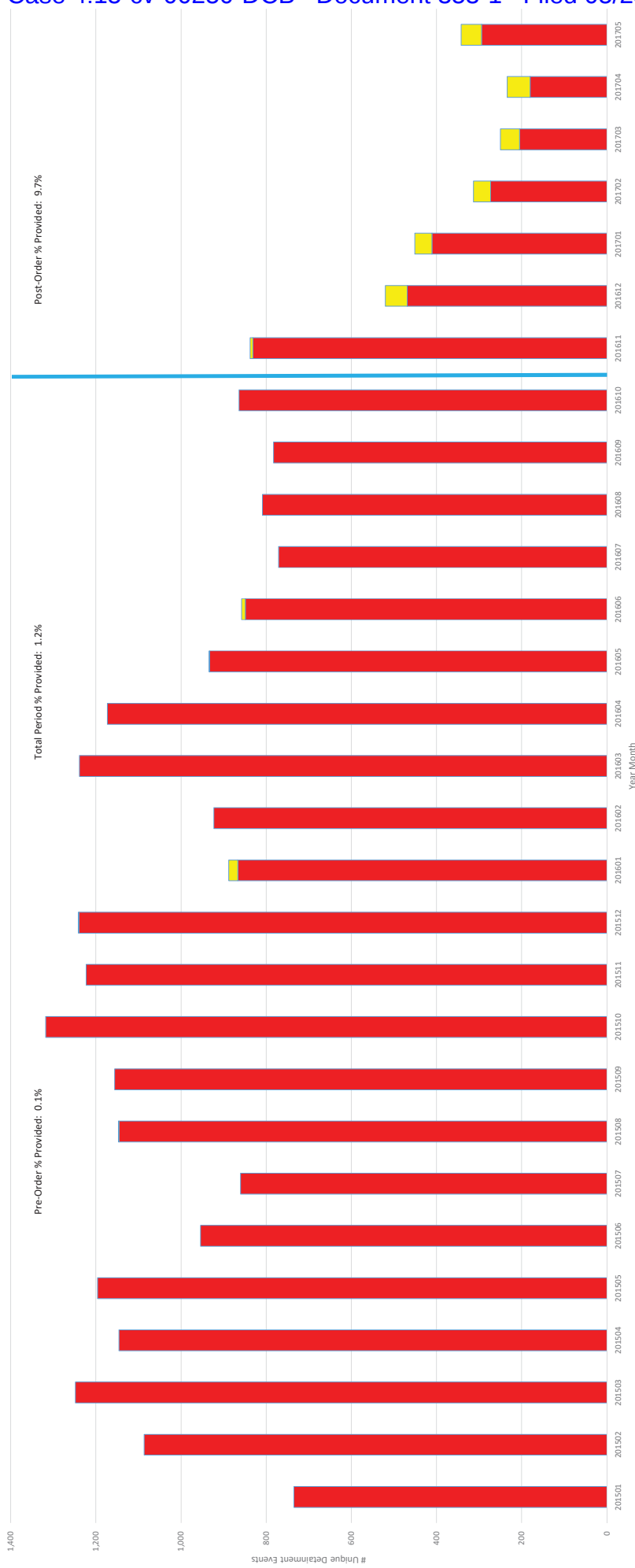
 Provided
  Not Provided


	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	0	0	0	0	26	0	0	20	0	0	0	2	0	1	5	10	35	10	1	0	0	58	310	486	359	307	189	76	10
Not Provided	732	925	888	598	727	509	390	496	441	684	478	714	550	679	699	832	1,074	722	430	381	499	931	834	563	376	415	412	209	274
Total	732	925	888	598	753	509	390	516	441	684	478	716	550	680	704	842	1,109	732	431	381	499	989	1,144	1,049	735	722	601	285	284
% Provided	0.0%	0.0%	0.0%	0.0%	3.5%	0.0%	0.0%	3.9%	0.0%	0.0%	0.0%	0.3%	0.0%	0.1%	0.7%	1.2%	3.2%	1.4%	0.2%	0.0%	0.0%	5.9%	27.1%	46.3%	48.8%	42.5%	31.4%	26.7%	3.5%

Provision for Wipes or Showers - Douglas Station

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

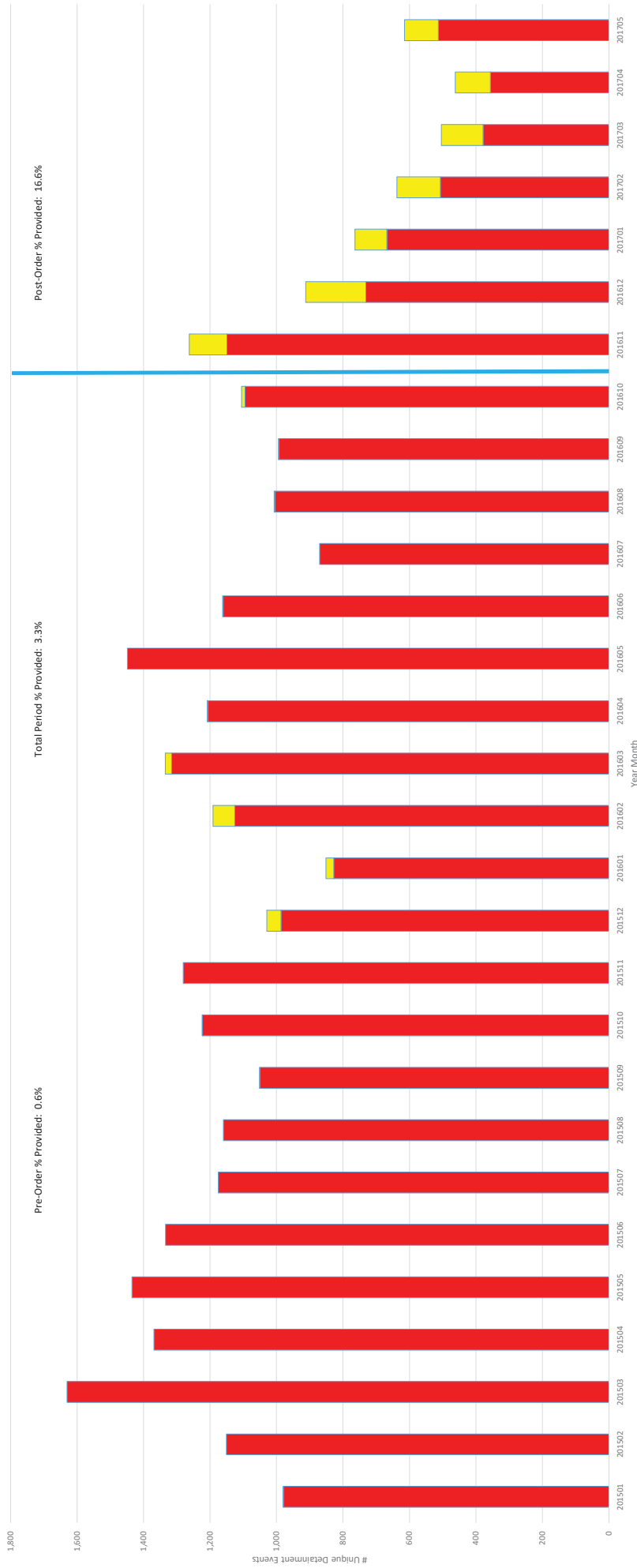
■ Provided
■ Not Provided

	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	0	0	0	0	0	0	0	1	0	0	0	1	21	0	0	0	1	9	0	0	0	0	7	51	40	40	45	54	48
Not Provided	735	1,087	1,248	1,146	1,196	954	860	1,146	1,156	1,318	1,223	1,240	867	923	1,239	1,173	933	849	771	809	783	864	831	469	411	273	205	180	294
Total	735	1,087	1,248	1,146	1,196	954	860	1,147	1,156	1,318	1,223	1,241	888	923	1,239	1,173	934	858	771	809	783	864	838	520	451	313	250	234	342
% Provided	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.1%	2.4%	0.0%	0.0%	0.0%	0.1%	1.0%	0.0%	0.0%	0.0%	0.0%	0.8%	9.8%	8.9%	12.8%	18.0%	23.1%	14.0%

Provision for Wipes or Showers - Nogales Station

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

■ Provided
■ Not Provided

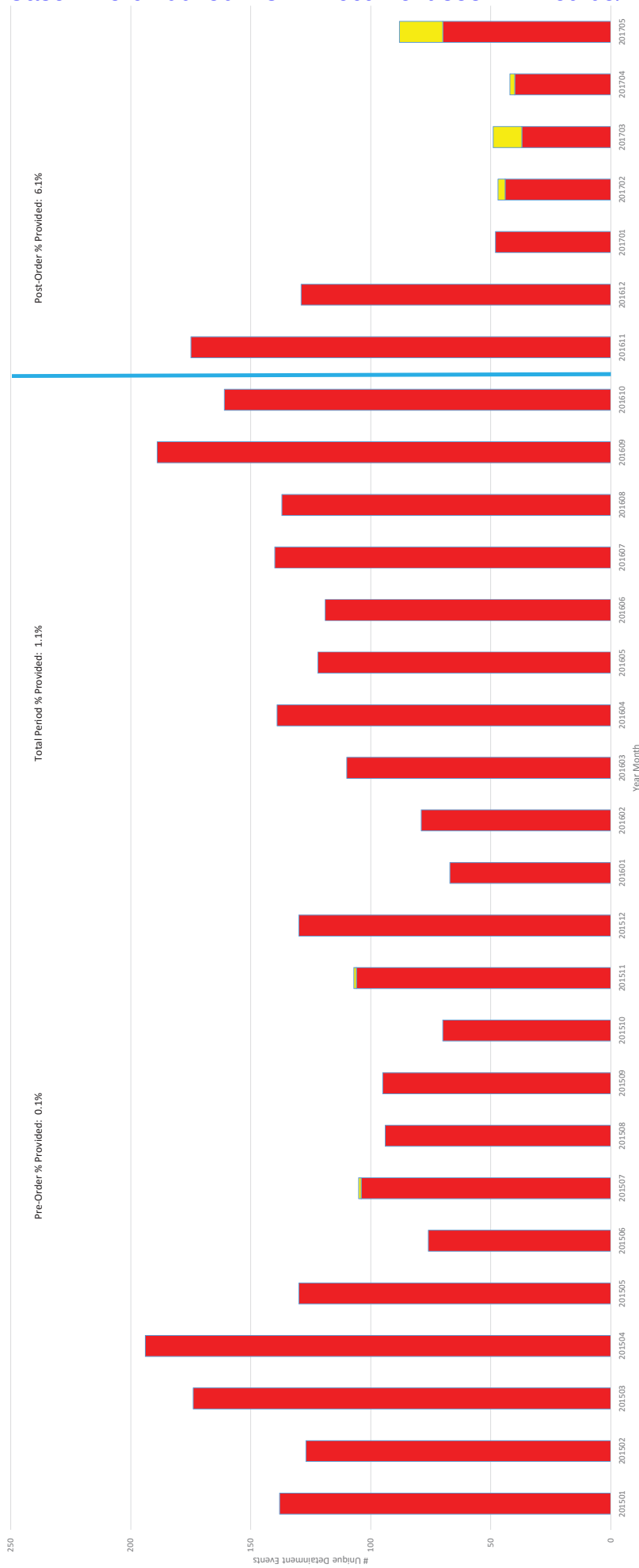
	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	1	65	19	2	0	0	0	0	1	1	0	42	23	65	19	2	0	1	0	2	1	10	114	181	96	131	126	106	102
Not Provided	979	1,151	1,631	1,369	1,435	1,334	1,175	1,160	1,050	1,223	1,281	987	828	1,126	1,316	1,207	1,449	1,161	870	1,005	993	1,095	1,149	731	668	507	378	356	513
Total	980	1,151	1,631	1,369	1,435	1,334	1,175	1,160	1,051	1,224	1,281	1,029	851	1,191	1,335	1,209	1,449	1,162	870	1,007	994	1,105	1,263	912	764	638	504	462	615
% Provided	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	4.1%	2.7%	5.5%	1.4%	0.2%	0.0%	0.1%	0.0%	0.2%	0.1%	0.9%	9.0%	19.8%	12.6%	20.5%	25.0%	22.9%	16.6%

Provision for Wipes or Showers - Sonoita Station

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

■ Provided
■ Not Provided

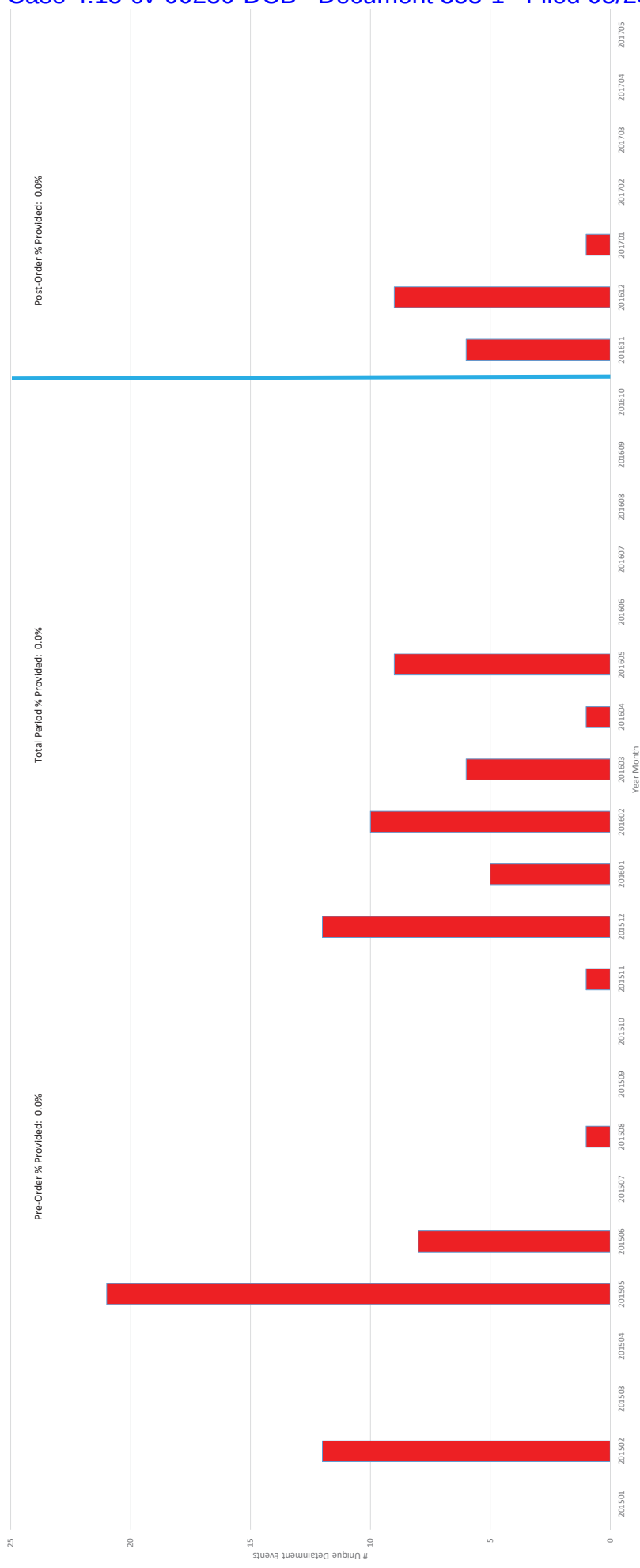


Provided	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Not Provided	138	127	174	194	130	76	104	94	95	70	106	130	67	79	110	139	122	119	140	137	189	161	175	129	48	44	37	40	18
Total	138	127	174	194	130	76	105	94	95	70	107	130	67	79	110	139	122	119	140	137	189	161	175	129	48	47	49	42	88
% Provided	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	0.0%	0.0%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.4%	24.5%	4.8%	20.5%

Provision for Wipes or Showers - Tucson Sector Nogales Processing Center

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

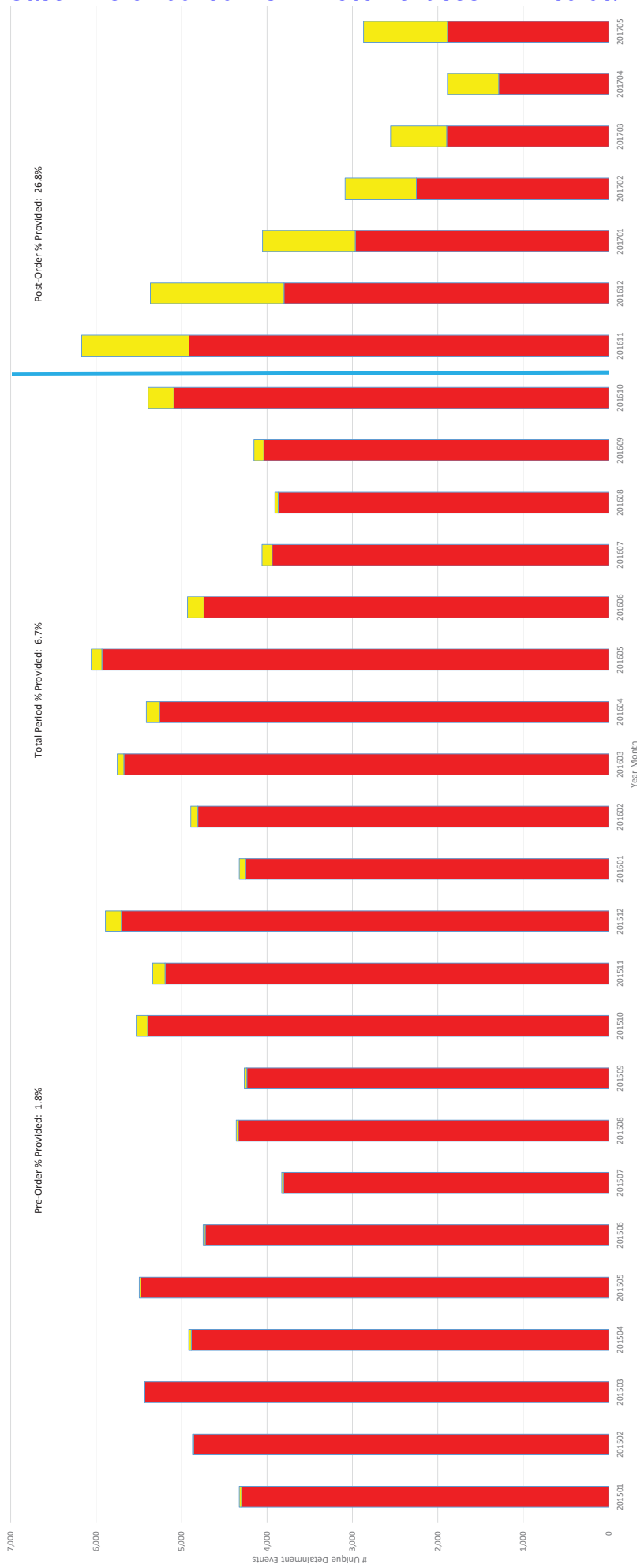
■ Provided
■ Not Provided

	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Not Provided	-	12	-	-	21	8	-	1	-	-	1	12	5	10	6	1	9	-	-	-	-	-	6	9	1	-	-	-	-
Total	-	12	-	-	21	8	-	1	-	-	1	12	5	10	6	1	9	-	-	-	-	-	6	9	1	-	-	-	-
% Provided	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Provision for Wipes or Showers - Tucson Sector Tucson Coordination Center

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

 Provided
  Not Provided


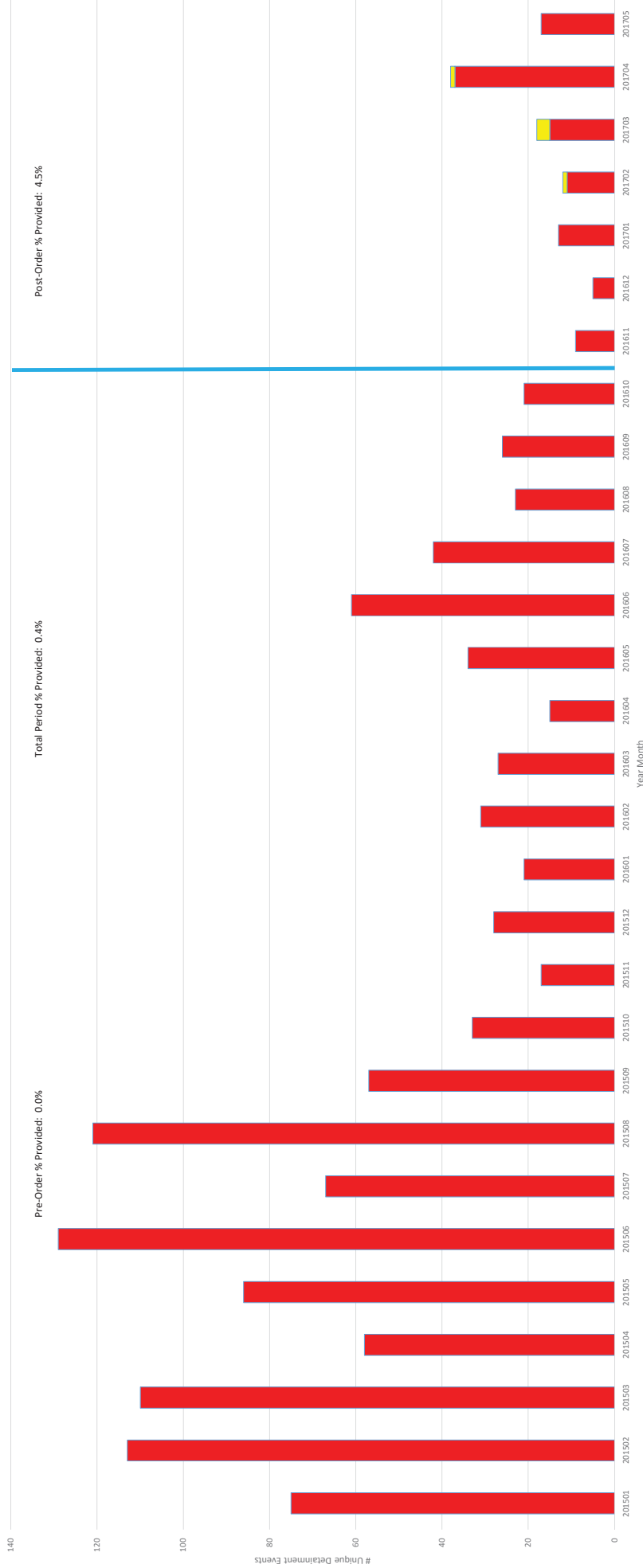
	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	28	10	5	30	18	24	20	24	30	134	146	186	73	84	76	155	127	192	118	39	116	300	1,255	1,564	1,083	833	655	600	983
Not Provided	4,298	4,861	5,432	4,887	5,478	4,723	3,808	4,337	4,236	5,398	5,194	5,706	4,251	4,810	5,676	5,258	5,932	4,739	3,940	3,870	4,037	5,091	4,914	3,802	2,969	2,252	1,898	1,289	1,888
Total	4,326	4,871	5,437	4,917	5,496	4,747	3,828	4,361	4,266	5,532	5,340	5,892	4,324	4,894	5,752	5,413	6,059	4,931	4,058	3,909	4,153	5,391	6,169	5,366	4,052	3,085	2,553	1,889	2,871
% Provided	0.6%	0.2%	0.1%	0.6%	0.3%	0.5%	0.5%	0.6%	0.7%	2.4%	2.7%	3.2%	1.7%	1.7%	1.3%	2.9%	2.1%	3.9%	2.9%	1.0%	2.8%	5.6%	20.3%	29.1%	26.7%	27.0%	25.7%	31.8%	34.2%

Provision for Wipes or Showers - Tucson Station

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

■ Provided
■ Not Provided

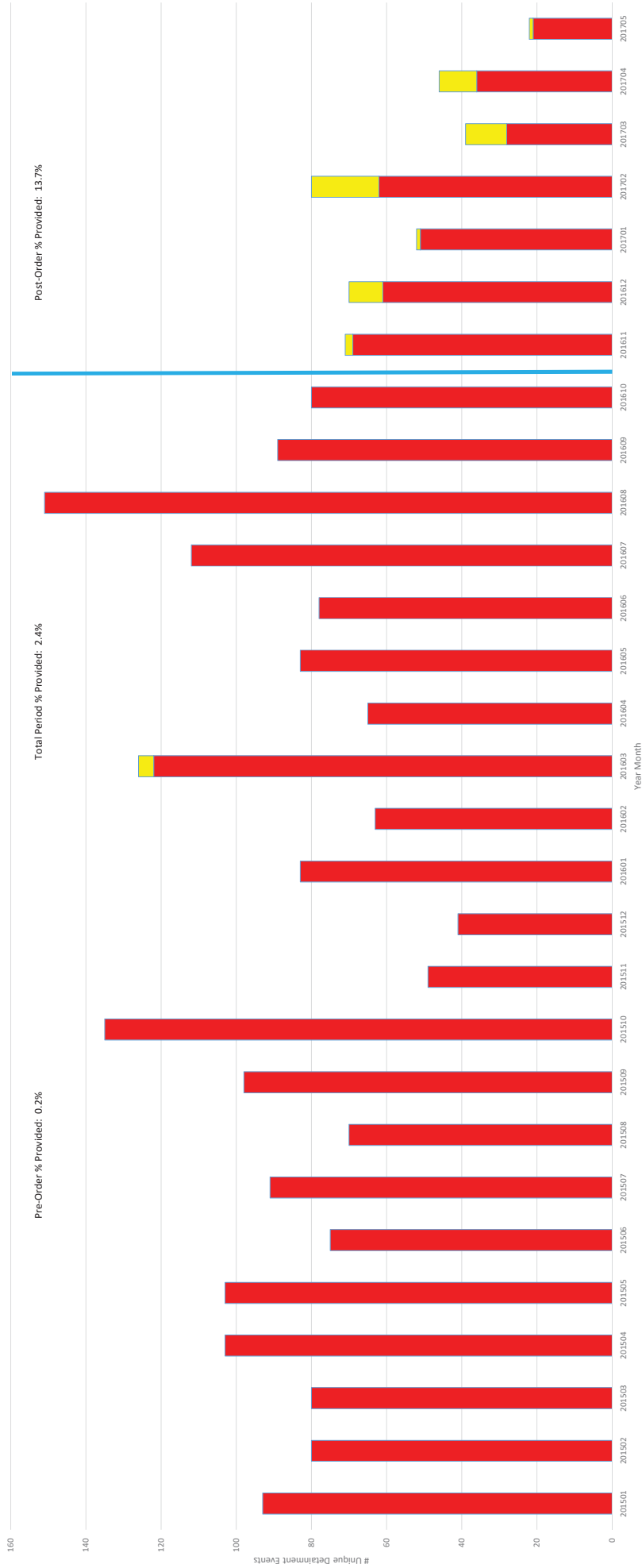


	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
Provided	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Not Provided	75	113	110	58	86	129	67	121	57	33	17	28	21	31	27	15	34	61	42	23	26	21	9	5	13	11	15	37	17
Total	75	113	110	58	86	129	67	121	57	33	17	28	21	31	27	15	34	61	42	23	26	21	9	5	13	12	18	38	17
% Provided	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	8.3%	16.7%	2.6%	0.0%

Provision for Wipes or Showers - Wilcox Station

Unique Detainment Events
January, 2015 - May, 2017

Order: November, 2016

■ Provided
■ Not Provided

201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	201701	201702	201703	201704	201705
93	80	80	103	103	75	91	70	98	135	49	41	83	63	122	65	83	78	112	151	89	80	69	61	51	62	28	36	21
93	80	80	103	103	75	91	70	98	135	49	41	83	63	126	65	83	78	112	151	89	80	71	70	52	80	39	46	22
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.8%	12.9%	1.9%	22.5%	28.2%	21.7%	4.5%

Provided
Not Provided
Total
% Provided